

**UNITED STATES OF AMERICA  
U.S. DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION**

**In the Matter of the Average System Cost Review of  
Avista Corporation**

**Docket No. ASC-10-AV-01**

**In the Matter of the Average System Cost Review of  
PacifiCorp**

**Docket No. ASC-10-PA-01**

**In the Matter of the Average System Cost Review of  
Portland General Electric Company**

**Docket No. ASC-10-PG-01**

**In the Matter of the Average System Cost Review of  
NorthWestern Energy**

**Docket No. ASC-10-NW-01**

**In the Matter of the Average System Cost Review of Idaho  
Power Company**

**Docket No. ASC-10-IP-01**

**In the Matter of the Average System Cost Review of  
Public Utility District No. 1 of Franklin County,  
Washington**

**Docket No. ASC-10-FR-01**

**In the Matter of the Average System Cost Review of  
Snohomish Public Utility District**

**Docket No. ASC-10-SN-01**

**PETITION TO INTERVENE OF PUGET SOUND ENERGY, INC.**

Bonneville Power Administration (“BPA”) has posted notice of FY 2010-2011 Average System Cost (“ASC”) Initial Utility filings on BPA’s website. BPA’s notice provided that petitions to intervene in the FY 2010-2011 ASC Review Process are due by October 21, 2008. Pursuant to Section III.D of BPA’s 2008 Average System Cost Methodology, any Regional Power Sales Customer or state utility Regulatory Body who so requests will be accorded party status for Bonneville’s ASC review process if said request is received by the established deadline. The filing Utility is automatically a party to its own ASC review proceeding. Accordingly, Puget Sound Energy, Inc. (“PSE”) hereby files this Petition to Intervene as a party

in each of Docket No. ASC-10-AV-01 (Avista Corporation), Docket No. ASC-10-PA-01 (PacifiCorp), Docket No. ASC-10-PG-01 (Portland General Electric Company), Docket No. ASC-10-NW-01 (NorthWestern Energy), Docket No. ASC-10-IP-01 (Idaho Power Company), Docket No. ASC-10-FR-01 (Public Utility District No. 1 of Franklin County, Washington), and Docket No. ASC-10-SN-01 (Snohomish Public Utility District).

## **I. PETITION TO INTERVENE**

PSE is an investor-owned utility with its principal place of business in Bellevue, Washington. The name and address of PSE are as follows:

Puget Sound Energy, Inc.  
10885 NE 4th Street  
P.O. Box 97034  
Bellevue, Washington 98009-9734

BPA's 2008 Average System Cost Methodology defines a "Regional Power Sales Customer" as "any entity that can contract directly with BPA for the purchase of power under sections 5(b), 5(c), or 5(d) of the Northwest Power Act for delivery in the region as defined by section 3(14) of the Northwest Power Act." PSE is an entity that can contract directly with BPA for the purchase of power under §§ 5(b) or 5(c) of the Northwest Power Act for delivery in the region as defined by § 3(14) of the Northwest Power Act. Therefore, PSE is a Regional Power Sales Customer eligible for party status in the above-captioned proceedings.

PSE has an interest in these proceedings, and PSE's interests cannot be adequately represented by any other party. Accordingly, PSE respectfully requests that it be allowed to intervene as a party in the above-captioned proceedings.

## II. COMMUNICATIONS

All materials and communications relating to these proceedings should be served on the following:

Sara J. Johnson  
Regulatory Policy Analyst  
Puget Sound Energy, Inc.  
10885 NE 4th Street  
P. O Box 97034 PSE – 08N  
Bellevue, WA 98009-9734  
Tel: (425) 462-3681  
Fax: (425) 462-3414  
Email: [sara.johnson@pse.com](mailto:sara.johnson@pse.com)

Donald G. Kari  
Jason Kuzma  
Perkins Coie LLP  
The PSE Building  
10885 N.E. 4th Street, Suite 700  
Bellevue, Washington 98004-5579  
Tel: (425) 635-1400  
Fax: (425) 635-2400  
Email: [DKari@perkinscoie.com](mailto:DKari@perkinscoie.com)  
[JKuzma@perkinscoie.com](mailto:JKuzma@perkinscoie.com)

## III. CONCLUSION

For the reasons stated above, PSE respectfully requests that it be allowed to intervene in each of each of Docket No. ASC-10-AV-01 (Avista Corporation), Docket No. ASC-10-PA-01 (PacifiCorp), Docket No. ASC-10-PG-01 (Portland General Electric Company), Docket No. ASC-10-NW-01 (NorthWestern Energy), Docket No. ASC-10-IP-01 (Idaho Power Company), Docket No. ASC-10-FR-01 (Public Utility District No. 1 of Franklin County, Washington), and Docket No. ASC-10-SN-01 (Snohomish Public Utility District).

DATED this 21st day of October 2008.

**Respectfully submitted**

**PERKINS COIE LLP**

By /s/ Donald G. Kari  
Donald G. Kari, WSBA #4717  
Jason Kuzma, WSBA #31830  
Attorneys for Puget Sound Energy, Inc.

