

UNITED STATES DEPARTMENT OF ENERGY  
BEFORE THE  
BONNEVILLE POWER ADMINISTRATION

<i>In the Matter of:</i>	)	
	)	
Average System Cost Review of:	)	
	)	
Avista Corporation,	)	BPA Docket Nos.     ASC-10-AV-01
Portland General Electric Company,	)	ASC-10-PG-01
Franklin County PUD,	)	ASC-10-FR-01
Idaho Power Company,	)	ASC-10-IP-01
NorthWestern Energy,	)	ASC-10-NW-01
Puget Sound Energy ,	)	ASC-10-PS-01
Snohomish PUD	)	ASC-10-SN-01
	)	
	)	PETITION TO INTERVENE OF
	)	PACIFICORP
	)	

On October 15, 2008, Bonneville Power Administration (“Bonneville”) posted notice of FY 2010-2011 Average System Cost (“ASC”) Review Process on Bonneville’s electronic website. Bonneville’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 of Bonneville’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, PacifiCorp (“PacifiCorp”) hereby files this Petition to Intervene as a party in each of these proceedings.

**I. PETITION TO INTERVENE**

PacifiCorp is an investor-owned utility with its principal place of business in Portland, Oregon. PacifiCorp is primarily engaged in the business of providing electric service to retail customers in six western states: Oregon, Washington, California, Wyoming, Utah, and Idaho.

As a load-serving entity, PacifiCorp is responsible for providing reliable and efficient electric service to more than 1.7 million consumers.

Bonneville'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."<sup>1</sup> PacifiCorp is an entity that can contract directly with Bonneville 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 and, therefore is a Regional Power Sales Customer eligible for party status in the above-captioned proceedings.

PacifiCorp has an interest in these proceedings, and PacifiCorp's interests cannot be adequately represented by any other party. Accordingly, PacifiCorp 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:

Natalie L. Hocken  
Vice President & General Counsel, Pacific Power  
PacifiCorp  
825 N.E. Multnomah, Suite 2000  
Portland, OR 97232  
Telephone: (503) 813-7205  
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<sup>1</sup> 2008 ASC Methodology, Section I.Q.

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With a courtesy copy requested to be sent to:

Phil Obenchain  
Director, Bonneville Regional Affairs  
PacifiCorp  
825 N.E. Multnomah, Suite 2000  
Portland, OR 97232  
Telephone: (503) 813-5990  
Facsimile: (503) 813-6508  
E-mail: [Phil.Obenchain@pacificorp.com](mailto:Phil.Obenchain@pacificorp.com)

### III. CONCLUSION

WHEREFORE, for the foregoing reasons, PacifiCorp respectfully requests that it be allowed to intervene in the above-captioned proceedings as a party.

DATED this 21<sup>st</sup> day of October 2008.

Respectfully Submitted,

By:   
Natalie L. Hocken  
Attorney for PacifiCorp

## CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing Petition to Intervene of PacifiCorp upon the parties listed below via e-mail:

Michelle Manary Supervisory Public Utilities Specialist – 2008 ASC  
Methodology Email: [BPAAverageSystemCost@bpa.gov](mailto:BPAAverageSystemCost@bpa.gov)

BPA's Office of General Counsel Kurt Casad, Office of the General Counsel,  
BPA Email: [krcasad@bpa.gov](mailto:krcasad@bpa.gov)

DATED this 21st day of October, 2008.

By:   
Natalie L. Höcken  
Attorney for PacifiCorp