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VIA ELECTRONIC MAIL

BPAAverageSystemCost@bpa.gov

October 31, 2008

Michelle L. Manary
REP Manager
Bonneville Power Administration, F-2
PO Box 3621
Portland, OR 97208-3621

RE: Petition for Late Intervention
BPA's FY 2010 ASC Review Proceeding
Docket Nos. ASC-10-AV-01; ASC-10-FR-01; ASC-10-IP-01; ASC-10-NW-01;
ASC-10-PA-01; ASC-10-FR-01; ASC-10-PS-01; ASC-10-SN-01

Enclosed for filing in the above-referenced dockets is a Petition for Late Intervention of the Washington Utilities and Transportation Commission. If you have any questions, please contact me at (360) 664-1189 or dtrotter@utc.wa.gov.

Sincerely,

DONALD T. TROTTER
Senior Counsel

DTT:klg
Enclosure



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

In the Matter of the FY 2010-11 Average
System Cost Review of

Avista Corporation

Docket No. ASC-10-AV-01

Public Utility District No. 1 of Franklin
County, Washington

Docket No. ASC-10-FR-01

Idaho Power Company

Docket No. ASC-10-IP-01

NorthWestern Energy

Docket No. ASC-10-NW-01

PacifiCorp

Docket No. ASC-10-PA-01

Portland General Electric Company

Docket No. ASC-10-PG-01

Puget Sound Energy

Docket No. ASC-10-PS-01

Snohomish PUD

Docket No. ASC-10-SN-01

**PETITION FOR LATE INTERVENTION OF THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

The Washington Utilities and Transportation Commission (WUTC), pursuant to Section 1010.4 of the Rules of Procedure Governing Bonneville Power Administration Rate Hearings, requests permission to intervene in the above-referenced proceedings. The WUTC has statutory authority to participate in federal proceedings such as these. *See* Wash. Rev. Code § 80.01.075.

The WUTC's intervention is late because the notice of the intervention deadline was not recognized by WUTC personnel as such until after the date for intervention had passed. The WUTC proceeded promptly to file this petition upon discovering this situation. The WUTC will not present any additional burden to the process.

In support of its petition, the WUTC further states as follows:

1. The WUTC is an agency of the State of Washington charged by statute to regulate in the public interest the rates, services, facilities, and practices of public service companies, including electric companies, doing business in the State of Washington. Wash. Rev. Code § 80.01.040(3). In that capacity, the WUTC regulates the retail rates and charges of the State's investor-owned utilities, including Puget Sound Energy, PacifiCorp and Avista, all of which purchase wholesale power and transmission services from the Bonneville Power Administration, and all of which participate in the Residential Exchange authorized by the Northwest Power Act.

2. Each utility's Average System Cost is critical to a determination of the level of Residential Exchange Benefits each utility receives. WUTC has an interest in assuring that the Average System Costs of Puget Sound Energy, PacifiCorp and Avista are fairly determined by BPA so their customers receive the Residential Exchange Benefits to which they are entitled.

3. The WUTC, therefore, has an interest in the dockets for Puget Sound Energy, PacifiCorp and Avista which cannot be represented by any other party.

4. In addition, the WUTC has an interest in fairness and consistency among each determination BPA makes of the Average System Cost for each utility identified in the caption above, even though the WUTC does not regulate the rates of any such utility other than PacifiCorp and Avista. Therefore, the WUTC also seeks to intervene in each of the dockets other

than the dockets for Puget Sound Energy, PacifiCorp, and Avista for that reason.

4. Intervention by the WUTC will not broaden the issues raised in this proceeding, will not disrupt the proceedings, will not affect the schedule, and will not burden other parties.

5. The following individuals have been designated to receive service of all documents on behalf of the WUTC in this proceeding:

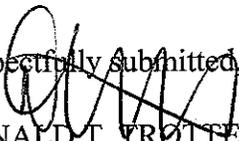
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For the reasons set forth above, the petition to intervene late of the WUTC should be granted along with all rights attributable to party status.

DATED this 31st day of October, 2008.

Respectfully submitted,


DONALD T. TROTTER
Senior Counsel
Counsel for the Washington Utilities
and Transportation Commission