

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Bonneville Power Administration

PacifiCorp

Idaho Power Company

Docket No. EL05-106

**MOTION TO INTERVENE OF  
PUBLIC UTILITY DISTRICT No 1. OF  
SNOHOMISH COUNTY, WASHINGTON**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC”), Public Utility District No. 1 of Snohomish County, Washington (“Snohomish”) hereby files this Motion to Intervene in the above-captioned proceeding initiated by the Bonneville Power Administration (“BPA”), PacifiCorp, and Idaho Power Company.

BPA, PacifiCorp, and Idaho Power are seeking a declaratory judgment on matters relating to the development of Grid West, a proposed transmission provider. Specifically, the petitioners seek clarification on eight questions relating to FERC’s authority to assert jurisdiction over Grid West if and when it becomes operational.

**I. DESIGNATION FOR COMMUNICATIONS**

The names, addresses and telephone numbers of persons to whom communications concerning this proceeding should be addressed are as follows:

Michael A. Goldfarb, Esq.  
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PUBLIC UTILITY DISTRICT NO. 1 OF  
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## **II. BASIS FOR INTERVENTION**

Snohomish was formed by a vote of the people of Snohomish County in 1936 to operate as a Public Utility District pursuant to Title 54 of the Revised Code of Washington. Snohomish is a not-for-profit, non-public distribution utility that serves approximately 267,000 residential customers and 26,000 commercial and industrial customers in Snohomish County and on neighboring Camano Island in the State of Washington.

BPA is the primary source of electric power for Snohomish. Snohomish in turn consumes about 10% of BPA's power and is BPA's largest public agency customer. Snohomish and its customers therefore pay approximately 10% of BPA's costs.

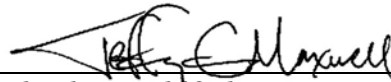
Snohomish has significant interests in BPA's decision to seek a declaratory order with FERC relating to Grid West's development. Snohomish is dependent upon BPA for transmission of electric power from outside of Snohomish's service area. Snohomish has been actively involved in the regional process concerning a possible regional transmission organization or other transmission alternatives. Snohomish's participation will serve the public interest and assist the Commission in fulfilling its responsibilities to protect consumers under the Federal Power Act ("FPA").

### III. CONCLUSION

Wherefore, Snohomish requests that the Commission grant Snohomish's motion to intervene.

Dated: May 11, 2005.

Respectfully submitted,



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Counsel for Public Utility District No. 1 of  
Snohomish County, Washington

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May, 2005, I have caused the foregoing document to be sent by (1) first-class mail to all parties on the service list compiled by the Secretary of the Commission in Docket No. EL05-106; and (2) via electronic service in Docket No. EL05-106.



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