

**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
UTILITIES OF THE WESTERN PUBLIC AGENCIES GROUP**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC”), the utilities of the Western Public Agencies Group (“WPAG”)¹ hereby file 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 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:

¹ The WPAG utilities include Benton REA, the cities of Ellensburg, Port Angeles and Milton, Washington, Lakeview Light and Power Company, Peninsula Light Company, Public Utility Districts Nos. 1 of Clallam, Clark, Kittitas, Lewis, and Mason Counties, Washington, Public Utility District No. 3 of Mason County, Washington, and Public Utility District No. 2 of Pacific County, Washington.

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II. BASIS FOR INTERVENTION

Each of the WPAG utilities is a consumer-owned, not-for-profit utility that relies, in whole or in part, on power purchased from the BPA to serve the electrical needs of its retail customers. Each of the WPAG utilities has either a Network or Point to Point Open Access Transmission Tariff (“OATT”) service agreement with BPA which is used to deliver federal and non-federal power to the service territory of each of the WPAG utilities. As such, each of the WPAG utilities is dependent on BPA for transmission services.

The WPAG utilities have significant interests in the disposition of the questions for which a declaratory order is sought. A large portion of the annual budgets of each of the WPAG utilities is composed of BPA power and transmission service costs, and each of the WPAG utilities is dependent on BPA for transmission services. As such, the disposition of the questions posed by BPA will directly impact the BPA transmission service upon which the WPAG utilities depend.

The WPAG utilities have been active participants in the Grid West process, including participation in various technical committees and the Regional Representatives Group. Participation by the WPAG utilities in this docket will serve the public interest and assist the Commission in fulfilling its responsibilities under the Federal Power Act (“FPA”).

III. CONCLUSION

Wherefore, the utilities of the Western Public Agencies Group request that the Commission grant this motion to intervene.

Dated: May 10, 2005.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May, 2005, I served one true copy of the MOTION TO INTERVENE OF UTILITIES OF THE WESTERN PUBLIC AGENCIES GROUP on each of the following parties, via U.S. Mail, first class postage pre-paid:

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The Honorable Ted Kulongoski
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DATED at Mill Creek, Washington, on May 11, 2005.


Karl F. Hausmann, WSBA # 21006