UNITED STATES DEPARTMENT OF ENERGY
BONNEVILLE POWER ADMINISTRATION

Expedited Rate Proceeding (BPA Docket No. BP-20E)

PETITION TO INTERVENE OF NORTHWEST REQUIREMENTS UTILITIES

Pursuant to the Federal Register Notice, 85 Fed. Reg. 37444 (June 22, 2020), and rule 1010.6 of the Bonneville Power Administration’s (“BPA”) Rules of Procedure (September 12, 2018), Northwest Requirements Utilities (“NRU”) submits this Petition to Intervene as a Party in this docket. In support of its Petition, NRU states the following:

1. NRU is a non-profit corporation organized under the laws of the state of Oregon to represent the interests of its utility members in all power supply, transmission, contract, and rate matters respecting BPA. NRU’s members are municipalities, public utility districts, people’s utility districts, special districts, tribal utilities, and electric cooperatives, all of which are located in BPA’s statutory service area. As such, these utilities are “public body and cooperative” customers of BPA and entitled to purchase power supplies from BPA on a preferential basis pursuant to section 5(b) of the Pacific Northwest Electric Power Planning and Conservation Act. 16 U.S.C. § 839c(b). The names of the utilities NRU will represent in this proceeding are attached as Attachment A to this Petition.
NRU’s utility members have a substantial interest in this docket because they pay power and transmission rates that are subject to the Financial Reserves Policy Surcharge (FRP Surcharge) at issue in this proceeding. The interests of NRU members are thus directly affected by the outcome of this docket, and no other party may adequately represent NRU’s interests.

In addition, Section 1010.6(b) of the BPA Rules of Procedure provide that entities that directly purchase power or transmission services from BPA and the trade organization that represent such customers are to be granted intervention in the proceeding. As NRU is a non-profit organization specifically organized to represent BPA customers in all matters related to all power supply, transmission, contract, and rate matters respecting to BPA, NRU should be granted intervention in the BP-20E proceeding.

2. NRU supports the proposed suspension of the Power and Transmission FRP Surcharge for the remainder of the BP-20 rate period as described in the Federal Register Notice.

3. Service of documents in this proceeding should be made upon the following individuals at the following addresses:

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<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Address</th>
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<tr>
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<tr>
<td>Megan Stratman</td>
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<td>(503) 233-3076</td>
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WHEREFORE, for the foregoing reasons, NRU respectfully requests that it be allowed to intervene in the above captioned proceeding as a party.

DATED this 22nd day of June, 2020.

CABLE HUSTON LLP

/s/ Thomas M. Grim
Thomas M. Grim
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Attorney for Northwest Requirements Utilities
ATTACHMENT A
NRU UTILITY MEMBERS

1. Ashland, City of
2. Big Bend Electric Co-Op
3. Bonners Ferry, City of
4. Burley, City of
5. Cascade Locks, City of
6. Central Lincoln PUD
7. Centralia City Light
8. Cheney, City of
9. Columbia Basin Electric Coop
10. Columbia Power Cooperative
11. Columbia REA
12. Columbia River PUD
14. Ferry County PUD #1
15. Flathead Electric Cooperative
16. Forest Grove, City of
17. Harney Electric Cooperative
18. Hermiston Energy Services
19. Heyburn, City of
20. Hood River Electric Coop
21. Idaho County Light & Power
22. Inland Power & Light
23. Kalispel Tribal Utilities
24. Klickitat PUD
25. Kootenai Electric Cooperative
26. Lost River Electric
27. Lower Valley Energy
28. Mason County PUD #3
29. Midstate Electric Cooperative
30. Milton-Freewater City Light & Power
31. Mission Valley Power
32. Missoula Electric Coop
33. Modern Electric Water Company
34. Monmouth, City of
35. Nespelem Valley Cooperative
36. Northern Wasco County PUD
37. Oregon Trail Electric Co-op
38. Peninsula Light
39. Ravalli County Electric Coop
40. Richland, City of
41. Rupert, City of
42. Salem Electric
43. Salmon River Electric Co-op
44. South Side Electric, Inc.
45. Surprise Valley Electric
46. Tanner Electric Cooperative
47. Tillamook PUD
48. United Electric Cooperative
49. Vera Water & Power
50. Vigilante Electric Coop
51. Wasco Electric Cooperative
52. Wells Rural Electric
53. Yakama Power
CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing by uploading it to the Bonneville Power Administration’s secure website. Pursuant to Section 1010.10(a) of the Rules and Procedure of the Bonneville Power Administration, such filing constitutes service on all Litigants.

Dated this 22\textsuperscript{nd} day of June, 2020.

CABLE HUSTON LLP

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