PETITION TO INTERVENE OF POWEREX CORP.


In support of this petition, Powerex respectfully shows the following:

I. SERVICE OF DOCUMENTS

All correspondence and communications in this proceeding should be addressed to the following persons:

Mr. Raj Hundal Mr. Tyler S. Johnson
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II. NATURE OF PROCEEDING

BPA has commenced a proceeding pursuant to Section 212(i)(2)(A) of the Federal Power Act, 16 U.S.C. § 824k(i)(2)(A), to adopt new and revised non-rate general terms and conditions for transmission, ancillary, and generator interconnection services over the Federal Columbia River Transmission System to be effective October 1, 2021.

III. INTEREST OF POWEREX AND PETITION TO INTERVENE

Powerex is a corporation organized under the Business Corporations Act of British Columbia, with its principal place of business at Vancouver, British Columbia, Canada. As the wholly-owned marketing subsidiary of the British Columbia Hydro and Power Authority (“BC Hydro”), a provincial Crown Corporation owned by the Government of British Columbia, Powerex is an instrumentality of a foreign state under the Foreign Sovereign Immunities Act.1 Powerex sells power at wholesale in the United States, pursuant to market-based rate authority originally granted by the Federal Energy Regulatory Commission on September 24, 1997.2

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Powerex sells power from a portfolio of resources, including the Canadian Entitlement resources made available under the Columbia River Treaty, BC Hydro system resources, and various other power resources acquired from other sellers within the United States and Canada. Powerex is a transmission customer of BPA and takes service under BPA’s existing Open Access Transmission Tariff, contracting with BPA for both firm and non-firm transmission service.

As a large transmission customer of BPA, Powerex has a direct and vital interest in the outcome of this proceeding, and this interest is not represented by any other customer of BPA. Any decision by the Administrator in Docket TC-22 could affect the terms and conditions for transmission service that BPA provides to Powerex. Therefore, Powerex respectfully requests that the Hearing Officer grant Powerex leave to intervene as a party to this rate proceeding.

Respectfully submitted,

/s/ Tyler S. Johnson
Tyler S. Johnson
Bracewell LLP

Attorney for Powerex Corp.

December 4, 2020
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 of Procedure of the Bonneville Power Administration, such filing constitutes service on all Litigants.

Submitted by,

/s/ Tyler S. Johnson
Counsel for Powerex Corp.