UNITED STATES DEPARTMENT OF ENERGY BONNEVILLE POWER ADMINISTRATION

Expedited Rate Proceeding

BPA Docket No. BP-20E

PETITION TO INTERVENE OF NORTHWEST REQUIREMENTS UTILITIES

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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.

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BP-20E-S-NR-01

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 nonprofit 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:

Thomas M. Grim Cable Huston LLP 1455 SW Broadway Suite 1500 Portland, Oregon 97201 Phone: (503) 224-3092 Fax: (503) 224-3176 Email: tgrim@cablehuston.com Megan Stratman Rates and Policy Director Northwest Requirements Utilities 825 NE Multnomah Street Suite 1135 Portland, Oregon 97232 Phone: (503) 233-5823 Fax: (503) 233-3076 Email: mstratman@nru-nw.com 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 1455 SW Broadway, Suite 1500 Portland, OR 97201 (503) 224-3092 tgrim@cablehuston.com

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
- 13. East End Mutual Electric Co., Ltd.
- 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 22nd day of June, 2020.

CABLE HUSTON LLP

/s/ Thomas M. Grim Thomas M. Grim 1455 SW Broadway, Suite 1500 Portland, OR 97201 (503) 224-3092 tgrim@cablehuston.com

Attorney for Northwest Requirements Utilities