

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION**

2024 Terms and Conditions Tariff Proceeding

BPA Docket No. TC-24

RENEWABLE NORTHWEST PETITION
TO INTERVENE

Pursuant to the Federal Register Notice, 87 Fed. Reg. 71,317 (November 22, 2022), regarding the Bonneville Power Administration’s (“BPA”) Proposed Modifications to Open Access Transmission Tariff; Public Hearing and Opportunities for Public Review and Comment, and Section 1010.6 of BPA’s Rules of Procedure (September 12, 2018), Renewable Northwest respectfully petitions to intervene as a party in this proceeding. In support of this petition, Renewable Northwest states as follows:

I. PETITION TO INTERVENE IN TC-24

Renewable Northwest is a non-profit advocacy organization that works to facilitate the expansion of responsibly developed renewable resources in the Northwest. Renewable Northwest has 75 member organizations that include renewable energy developers and manufacturers, as well as consumer advocates, environmental groups, and other industry advisers. The common goal of Renewable Northwest’s members is to promote the development of a cost-effective, reliable, and clean energy system for the betterment of the Northwest economy and environment. Renewable Northwest advocates for renewable energy expansion before state and regional policymakers, including BPA and the Northwest Power and Conservation Council, as well as state agencies, regulators, and individual utilities. In pursuit of

Renewable Northwest’s mission to expand environmentally responsible, new renewable resources, Renewable Northwest has been involved in numerous BPA rate proceedings, informal processes, and BPA forums related to the transmission and integration of Variable Energy Resources, including the pre-rate case workshops leading up to this proceeding.

Under BPA’s rules, Renewable Northwest has the right to intervene because “[e]ntities that directly purchase power or transmission services under Bonneville’s rate schedules, or trade organizations representing those entities, will be granted intervention.”¹ Renewable Northwest has a direct and substantial interest in the proceeding, including but not limited to: 1) members of Renewable Northwest are transmission customers or eligible customers in the transmission and interconnection queues of BPA Transmission Services that will be directly affected by the terms and conditions that BPA will consider in this proceeding; and 2) the proceeding could impact the performance of BPA, states, and individual utilities related to clean energy implementation and de-carbonization. In addition, Renewable Northwest’s intervention in this proceeding is in the public interest. Renewable Northwest’s interests will not be adequately represented by any other party. Therefore, Renewable Northwest respectfully requests that this petition to intervene be granted.

II. COMMUNICATIONS

Communication in connection with this filing should be addressed to:

Nicole Hughes
Executive Director
Renewable Northwest
421 SW 6th Ave, Suite 1400
Portland, OR 97204
Telephone: (503) 789-5741
Email: bpafilings@renewablenw.org

Robin Arnold
Markets & Transmission Director
Renewable Northwest
421 SW 6th Ave., Suite 1400
Portland, OR 97204
Telephone: 503.223.4544 x107
Email: bpafilings@renewablenw.org

¹ Rule 1010.6(b).

Dina Dubson Kelley
Sanger Law PC
4031 SE Hawthorne Blvd.
Portland, OR 97214
Telephone: (503) 975-7661
Fax: (503) 334-2235
Email: bpadockets@sanger-law.com

III. CONCLUSION

For the reasons stated herein, Renewable Northwest respectfully requests that it be allowed to intervene as a party in the TC-24 proceeding.

DATED this 1st day of December, 2022.

Respectfully submitted,

/s/ Dina Dubson Kelley
Dina Dubson Kelley
Sanger Law PC