



of the generally applicable open access transmission tariff that is subject to revision in this proceeding. The interests of NIU members are thus directly affected by the outcome of this docket, and no other party may adequately represent NIU's interests.

In addition, Section 1010.6(b) of the BPA Rules of Procedure provides that entities that directly purchase power or transmission services from BPA and the trade organizations that represent such customers are to be granted intervention in the proceeding. As NIU is a non-profit corporation specifically organized to represent BPA customers in matters related to power supply, transmission, contract, and rate matters respecting BPA, NIU should be granted intervention in the BP-22 proceeding.

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

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Megan Stratman  
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3. WHEREFORE, for the foregoing reasons, NIU respectfully requests that it be allowed to intervene in the above-captioned proceeding as a party.

DATED this 3rd day of December, 2020.

FOR NORTHWEST IRRIGATION  
UTILITIES:

/s/ Zabyrn Towner

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*Attorney for Northwest Irrigation Utilities*

**ATTACHMENT A**  
**NIU UTILITY MEMBERS**

1. Benton REA
2. Big Bend Electric Cooperative
3. Columbia Basin Electric Cooperative
4. Columbia Power Cooperative
5. Columbia REA
6. Harney Electric Cooperative
7. Inland Power & Light
8. Klickitat PUD
9. Lost River Electric
10. Midstate Electric Cooperative
11. Mission Valley Power
12. Nespelem Valley Cooperative
13. Oregon Trail Electric Cooperative
14. South Side Electric, Inc.
15. Surprise Valley Electric Co.
16. United Electric Cooperative
17. Vigilante Electric Cooperative
18. Wasco Electric Cooperative
19. Wells Rural Electric Co.

## 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.

DATED this 3rd day of December, 2020.

FOR NORTHWEST  
IRRIGATION UTILITIES:

*/s/ Zabyrn Towner*

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