### UNITED STATES DEPARTMENT OF ENERGY BONNEVILLE POWER ADMINISTRATION

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Proposed Modifications To Open Access Transmission Tariff

**BPA Docket No. TC-22** 

### PETITION TO INTERVENE OF NORTHWEST IRRIGATION UTILITIES

Pursuant to the Federal Register Notice, 85 Fed. Reg. 77,196 (December 1, 2020) and rule 1010.6 of the Bonneville Power Administration's ("BPA") Rules of Procedure (September 12, 2018), Northwest Irrigation Utilities ("NIU") submits this Petition to Intervene as a Party in this proceeding. In support of its Petition, NIU states the following:

1. NIU is a non-profit corporation organized under the laws of the state of Oregon to represent the interests of its utility members in power supply, transmission, contract, and rate matters respecting BPA. NIU's members are rural electric utilities that have significant agriculturally based electrical loads and rely upon BPA as their primary or exclusive provider of power and transmission services. 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). A list of NIU's member utilities is provided in Attachment A to this Petition.

NIU's utility members have a substantial interest in this docket because they are subject to and are otherwise financially affected by the non-rate terms and conditions NIU PETITION TO INTERVENE 1 TC22-S-NW-01 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

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individuals at the following addresses:

Zabyn Towner General Counsel Northwest Requirements Utilities 825 NE Multnomah St. Suite 1135 Portland, Oregon 97232 Phone: (503) 351-0485 Email: ztowner@nru-nw.com

Blake Weathers Resources and Planning Director NW Energy Mgmt. Services 825 NE Multnomah St. Suite 1135 Portland, OR 97232 Phone: (503) 261-3078 Email: bweathers@nru-nw.com Megan Stratman Rates and Policy Director Northwest Requirements Utilities 825 NE Multnomah St. Suite 1135 Portland, Oregon 97232 Phone: (503) 957-3294 Email: mstratman@nru-nw.com 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:

<u>/s/ Zabyn Towner</u>

Zabyn Towner Northwest Irrigation Utilities 825 NE Multnomah St. Suite 1135 Portland, Oregon 97232 Phone: (503) 351-0485 <u>Email: ztowner@nru-nw.com</u>

Attorney for Northwest Irrigation Utilities

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## 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:

<u>/s/ Zabyn Towner</u>

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