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 REQUIREMENTS 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 Requirements Utilities ("NRU") submits this Petition to Intervene as a Party in this proceeding. 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). A list of NRU's member utilities is provided in Attachment A to this Petition.

NRU'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 NRU PETITION TO INTERVENE 1 TC-22-S-NR-01 of the generally applicable open access transmission tariff that is subject to revision 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 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 NRU is a non-profit corporation specifically organized to represent BPA customers in all matters related to all power supply, transmission, contract, and rate matters respecting BPA, NRU should be granted intervention in the TC-22 proceeding.

2. Service of documents in this proceeding should be made upon the following 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

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3. WHEREFORE, for the foregoing reasons, NRU 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 REQUIREMENTS UTILITIES:

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

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

Attorney for Northwest Requirements Utilities

ATTACHMENT A NRU UTILITY MEMBERS

- 1. Ashland, City of
- 2. Big Bend Electric Cooperative
- 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 Cooperative
- 10. Columbia Power Cooperative
- 11. Columbia REA
- 12. Columbia River PUD
- 13. East End Mutual Electric Co., Ltd.
- 14. Ellensburg, City of
- 15. Ferry County PUD #1
- 16. Flathead Electric Cooperative
- 17. Forest Grove, City of
- 18. Harney Electric Cooperative
- 19. Hermiston Energy Services
- 20. Heyburn, City of
- 21. Hood River Electric Cooperative
- 22. Idaho County Light & Power
- 23. Inland Power & Light
- 24. Kalispel Tribal Utilities
- 25. Klickitat PUD
- 26. Kootenai Electric Cooperative
- 27. Lost River Electric
- 28. Lower Valley Energy
- 29. Mason County PUD #3
- 30. McMinnville, City of
- 31. Midstate Electric Cooperative
- 32. Milton-Freewater City Light & Power
- 33. Mission Valley Power
- 34. Missoula Electric Coop
- 35. Modern Electric Water Company
- 36. Monmouth, City of
- 37. Nespelem Valley Cooperative
- 38. Northern Wasco County PUD

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- 39. Oregon Trail Electric Cooperative
- 40. Peninsula Light Company
- 41. Ravalli Electric Cooperative¹
- 42. Richland, City of
- 43. Rupert, City of
- 44. Salem Electric
- 45. Salmon River Electric Cooperative
- 46. South Side Electric, Inc.
- 47. Surprise Valley Electric Co.
- 48. Tanner Electric Cooperative
- 49. Tillamook PUD
- 50. United Electric Cooperative
- 51. Vera Water & Power
- 52. Vigilante Electric Cooperative
- 53. Wasco Electric Cooperative
- 54. Wells Rural Electric Co.
- 55. Yakama Power

¹ Ravalli Electric Cooperative will no longer be a member of NRU effective January 1, 2021.

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 REQUIREMENTS, UTILITIES:

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

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

Attorney for Northwest Requirements Utilities

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