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3
4 UNITED STATES OF AMERICA
5 U.S. DEPARTMENT OF ENERGY
6 BEFORE THE
7 BONNEVILLE POWER ADMINISTRATION

8 2009 PROPOSED WIND)
9 INTEGRATION RATE CASE) BPA Docket No. WI-09
10)
11)

12 PETITION TO INTERVENE BY
13 CITY OF TACOMA TO BE A FORMAL PARTY

14 TO: Brandon Hignite - Hearing Clerk
15 2009 Wind Integration Rate Case, L-7
16 Bonneville Power Administration
17 905 N.E. 11th Avenue
18 Portland, OR 97232
19 wi09rate@bpa.gov

20 The City of Tacoma, Department of Public Utilities, Light Division (Washington),
21 dba Tacoma Power ("TPWR"), by and through its undersigned legal counsel and Chief
22 Executive Officer, hereby petitions to intervene as a formal party in the Bonneville
23 Power Administration 2009 Wind Integration Rate Case proceeding (WI-09).

24 PETITIONER'S NAME AND STREET ADDRESS

25 City of Tacoma
26 Department of Public Utilities
Light Division
3628 South 35th Street
Tacoma, WA 98409

PETITION TO INTERVENE - 1
WI-09

Office of the City Attorney
Department of Public Utilities
3628 South 35th Street
P. O. Box 11007
Tacoma, Washington 98411
Phone 253.502.8348
Facsimile 253.502.8672

1 INTEREST

2 Tacoma Power is a customer of BPA pursuant to Point-to-Point Transmission
3 Service Agreement No. 98TX-10103 (as amended) and other contracts, therefore, has a
4 direct interest in the outcome of said rate proceeding, and terms and conditions
5 proceeding.

6 Tacoma Power is a publicly owned electric utility that serves retail electric loads
7 in Tacoma, Washington. Tacoma Power also owns generating resources and uses
8 BPA's transmission system for deliveries of power. It is a partial requirement
9 preference customer of BPA under the current contract with BPA.
10

11 As a publicly owned utility in the Northwest, Tacoma Power has preference rights
12 under federal acts. Under the Pacific Northwest Power Planning and Conservation Act,
13 it may request power or other services from BPA at any time and has the right to
14 purchase power and transmission under one or more of the proposed rate schedules in
15 this proceeding.

16 Tacoma Power has a direct and substantial interest in this proceeding since the
17 revenues collected under this rate have potential to impact Tacoma Power's
18 transmission rates and Tacoma Power may wish to purchase the wind integration
19 service from BPA in the future. Its interests are unique and not otherwise represented
20 by other parties to this proceeding.
21

22 SERVICE OF DOCUMENTS


23 Petitioner, Tacoma Power, hereby designates the following representatives upon whom
24 service of documents may be made:


1 (1) Travis Metcalfe
2 Power Management
3 Tacoma Power
4 3628 South 35th Street
5 Tacoma, WA 98409-3192
6 Telephone: 253-502-8149
7 Facsimile: 253 502-8628

8 (2) Anne L. Spangler
9 Chief Assistant City Attorney
10 City of Tacoma
11 3628 South 35th Street
12 Tacoma, WA 98409-3192
13 Telephone: 253-502-8218
14 Facsimile: 253 -502-8672

15 DATED this 12th day of February, 2008.

16 CITY OF TACOMA

17 By: 
18 William A. Gaines,
19 Director of Utilities/CEO

20 By: 
21 Anne L. Spangler,
22 Chief Assistant City Attorney

1 CERTIFICATE OF SERVICE

2 I hereby certify that on this day I placed a copy of the foregoing document with
3 Federal Express, for overnight delivery, postage prepaid, addressed as follows:

4 Brandon Hignite - Hearing Clerk Barry Bennett, LC-7
5 2009 Wind Integration Rate Case L-7 Office of General Counsel
6 Bonneville Power Administration Bonneville Power Administration
905 N.E. 11th Avenue 905 N.E. 11th Avenue
Portland, OR 97232 Portland, OR 97232


7
8 I have e-mailed a copy of the foregoing document to the above listed parties,
9 addressed as follows:

10 Brandon Hignite Barry Bennett
wi09rate@bpa.gov bbennett@bpa.gov

11 I have also e-mailed a copy of the foregoing document to the following:

12 Toni Timberman
13 Sr. Transmission Account Executive
ttimberman@bpa.gov

14 DATED this 12th day of February, 2008, in Tacoma, Washington.

15
16 
17 Diane M. Jensen