

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

In the Matter of:)	
)	BPA File No. WI-09
2009 Wind Integration)	
Within Hour Balancing Service Rate)	PETITION FOR LEAVE TO INTERVENE
)	
)	
)	
)	

PETITION FOR LEAVE TO INTERVENE
BY THE WESTERN PUBLIC AGENCIES GROUP

Pursuant to the Federal Register Notice for the 2007 Wind Integration – Within Hour Balancing Service Rate, published February 8, 2008, and the Bonneville Power Administration’s Rules of Procedures Governing Rate Hearings, 51 Fed. Reg. 7611(1985), each of the utilities that comprise the Western Public Agencies (“WPAG”)¹ hereby individually file this petition for leave to intervene in the above captioned matter as a party of right. In support of this petition, the following information is provided.

I.

Each of the utilities that comprise the WPAG currently purchases wholesale power from the Bonneville Power Administration under rates that will be affected by the costs collected by the proposed rate, and will continue to do so during the period when the rates that will be established in this proceeding are in effect.

¹ The utilities that comprise the Western Public Agencies Group are set forth on Attachment A.

II.

The costs included in the rates that will be established in the above proceeding will affect the level of the rates that each of the WPAG utilities will pay to the Bonneville Power Administration for wholesale power, and will directly affect the consumers served by those utilities. No other party to this proceeding will adequately represent the interests of the WPAG utilities.

III.

All materials, documents and communications relating to the above captioned proceedings should be served on the following:

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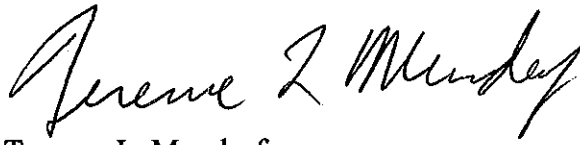
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IV.

WHEREFORE, for the foregoing reasons each of the utilities which comprise the WPAG respectfully requests party status in the above captioned proceeding.

Dated this 12th day of February, 2008.

MARSH MUNDORF PRATT SULLIVAN + McKENZIE

A handwritten signature in black ink, reading "Terence L. Mundorf". The signature is written in a cursive style with a large, stylized initial 'T'.

Terence L. Mundorf
Attorney for the Western Public
Agencies Group

ATTACHMENT A

The utilities that comprise the Western Public Agencies Group are Benton Rural Electric Association, the Cities of Port Angeles, Ellensburg and Milton, Washington, the Towns of Eatonville and Steilacoom, Washington, Alder Mutual Light Company, Elmhurst Mutual Power and Light Company, Lakeview Light and Power Company, Parkland Light and Water Company, Peninsula Light Company, Public Utility Districts No. 1 of Clallam, Clark, Grays Harbor, Kittitas, Lewis, Mason and Skamania Counties, Washington, Public Utility District No. 3 of Mason County, Washington and Public Utility District No. 2 of Pacific County, Washington.