

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

**Proposed Modifications to Open** )  
**Access Transmission Tariff** )

**BPA File No.: TC-22**

**PETITION TO INTERVENE OF  
THE PUBLIC POWER COUNCIL**

Pursuant to Section 1010.6 of the Rules of Procedure of the Bonneville Power Administration (BPA or Bonneville) and the Federal Register Notice dated December 1, 2020 (85 Fed. Reg. 77,196), the Public Power Council (PPC) hereby petitions for leave to intervene as a party in the above-captioned proceeding. BPA commenced this proceeding to modify the non-rate terms and conditions of its generally applicable open access transmission tariff (OATT) to be effective on October 1, 2021.

PPC is a non-profit trade organization that represents the common interests of consumer-owned electric utilities in the Pacific Northwest that are preference customers of BPA. PPC's members purchase transmission, ancillary, or generator interconnection services from BPA pursuant to the terms and conditions BPA establishes in its OATT. BPA is a self-funding agency and covers its costs by selling its products and services. Overall, Northwest public power is among the largest purchasers of BPA's transmission products and services and funds over 40 percent of the agency's transmission costs.

Pursuant to Section 1010.6(b) of BPA's Rules of Procedure, "[e]ntities that directly purchase power or transmission services under Bonneville's rate schedules, or trade organizations representing those entities, will be granted intervention, based on a petition filed in

conformity with this Section 1010.6.” PPC is a trade organization within the meaning of Section 1010.6(b) and has a direct and substantial interest in participating in this proceeding.

All pleadings, materials, and other communications relating to this proceeding should be served on the following individuals:

Lauren Tenney Denison  
Director, Market Policy & Grid Strategy  
Public Power Council  
650 NE Holladay, Suite 810  
Portland, OR 97232  
Phone (503) 595-9777  
Email: [tenney@ppcpdx.org](mailto:tenney@ppcpdx.org)

Michael Linn  
Senior Policy Analyst  
Public Power Council  
650 NE Holladay, Suite 810  
Portland, OR 97232  
Phone (503) 595-9776  
Email: [mlinn@ppcpdx.org](mailto:mlinn@ppcpdx.org)

Michael Deen  
Policy Director  
Public Power Council  
650 NE Holladay, Suite 810  
Portland, OR 97232  
Phone (503) 595-9774  
Email: [mdeen@ppcpdx.org](mailto:mdeen@ppcpdx.org)

Irene Scruggs  
General Counsel  
Public Power Council  
650 NE Holladay, Suite 810  
Portland, OR 97232  
Phone (503) 595-9779  
Email: [iscruggs@ppcpdx.org](mailto:iscruggs@ppcpdx.org)

Wherefore, PPC requests that this petition to intervene be granted and PPC be made a formal party to this proceeding.

DATED this 3rd day of December, 2020.

Respectfully submitted,

/s/ Irene A. Scruggs  
Irene A. Scruggs  
General Counsel  
Public Power Council

## 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.

Submitted by,

/s/ Irene A. Scruggs

Irene A. Scruggs

General Counsel

Public Power Council