

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

TIERED RATE METHODOLOGY
WHOLESALE POWER RATE
PROCEEDING

BPA Docket TRM-12

**JOINDER OF GEORGIA-PACIFIC LLC IN
MOTION OF THE PUBLIC POWER COUNCIL TO STRIKE
PORTIONS OF DIRECT TESTIMONY OF THE
PACIFIC NORTHWEST INVESTOR-OWNED UTILITIES**

Pursuant to Section 1010.11(d) of the BPA Rules of Procedure Governing Rate Hearings, Georgia-Pacific, LLC (GP) hereby joins in the Motion of the Public Power Council filed on August 14 in this matter to strike portions of the testimony of the Pacific Northwest Investor-Owned Utilities (IOUs). Both Sections II and II of the IOUs' testimony should be stricken as beyond the scope of the proceeding.

In Section II the IOUs feign confusion as to the scope of this proceeding.¹ The IOUs assert that the proceeding should be limited to rate design of the PF Rate, and should not preclude certain rate treatment for other rate schedules. The IOUs then attempt to re-introduce their testimony from the WP-07 case regarding the rate treatment for those other rate schedules. Given that cost allocation to other rate schedules is not dealt with in this docket, the bootstrapping of the IOUs' prior testimony on another issue should not be allowed.

¹ *IOU Testimony*, p. 5, lines 12-18.

The scope of this proceeding is clear. It is, as the IOUs admit, limited to design of the PF rate. The Federal Register Notice states in several places that the TRM establishes rate design for the PF rate.² It does not provide for consideration of the rate design for any other rate. Similarly, the testimony of BPA Staff repeatedly states that the tiered rate applies “only [to] the PF Rate.”³ Staff also states that “[t]iering is primarily a PF rate design matter.”⁴ The proposed tiered rate methodology only affects the PF rate; it does not purport to determine any other rate or the costs allocated to it. The testimony submitted by the IOUs as to what “should not be precluded” is immaterial to any issue relevant to this case, and Section II should be stricken.

Section III also deals with issues beyond the scope of this proceeding. The IOU testimony asserts that the template for the Regional Dialogue contract must be clarified regarding the treatment of environmental attributes.⁵ The Federal Register notice of this proceeding specifically directs the hearing officer to exclude any evidence “*that seek[s] to address the design and scope of the power products and terms and conditions of the Regional Dialogue contracts.*”⁶ The testimony of the IOUs related to the treatment of environmental attributes in Regional Dialogue contracts should be dealt with in the appropriate forum, and not in this case.

² 2012 Tiered Rate Methodology Proceeding, 73 FR 24961, 24962 (May 6, 2008) (“FRN”).

³ TRM-12-E-BPA-02, p. 10, line 18; see also, p. 2, lines 15-17; p. 4, lines 4-5; p. 5, lines 18-19.

⁴ *Id.*, p. 25, line 3.

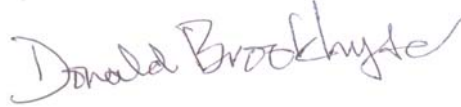
⁵ IOU Testimony, p. 15, line 9 – p. 16, line 9; p. 17, lines 20-21.

⁶ FRN, p. 24962.

WHEREFORE, Georgia-Pacific, LLC supports the motion by the Public Power Council to strike Sections II and III of the IOUs' testimony.

Respectfully submitted,

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A handwritten signature in dark ink, reading "Donald Brookhyser". The signature is written in a cursive, flowing style.

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August 15, 2008

CERTIFICATE OF SERVICE

I, Kari Harteloo, certify that I have caused the *Joinder of Georgia-Pacific LLC in Motion to Strike* to be served by electronic mail on the parties listed below in accordance with the Hearings Officer's order, TRM-12-HOO-07.

Dated August 15, 2008 at Portland, Oregon.



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