

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

In the Matter of:)
)
2014 Power and Transmission Rate) **BPA Docket No. BP-14**
Adjustment Proceeding)
)

**PETITION TO INTERVENE OF
EDP RENEWABLES NORTH AMERICA LLC**

Pursuant to section 1010.4 of the Rules of Procedure Governing Rate Hearings of the Bonneville Power Administration (BPA) and the Federal Register notice issued on November, 8, 2012,¹ EDP Renewables North America LLC (EDPRNA) hereby files this Petition to Intervene in the above-captioned proceeding.

I. COMMUNICATIONS

EDPRNA requests that communications in this proceeding be addressed to the following individuals:

Leslie A. Freiman, Esq.*
General Counsel
EDP Renewables North America LLC
808 Travis Street
Suite 700
Houston, TX 77002
Tel: (713) 265-0350
Fax: (713) 265-0365
leslie.freiman@edpr.com

Margaret A. Moore
Jessica C. Friedman*
Van Ness Feldman, LLP
1050 Thomas Jefferson St., NW
Washington, D.C. 20007
Tel: (202) 298-1800
Fax: (202) 338-2416
mam@vnf.com
jcf@vnf.com

**Individuals designated for official service in this proceeding*

¹ 77 Fed. Reg. 66,966 (Nov. 8, 2012).

II. BACKGROUND

In the November 8, 2012 Federal Register notice, BPA announced the commencement of a power and transmission rate adjustment proceeding for power, transmission, control area services and ancillary services rates proposed to be effective on October 1, 2013. BPA is proposing five different rates for Federal power sales and services, rates for six ancillary services and rates for six control area services. In addition, BPA is proposing an overall 13% increase in transmission rates.

III. PETITION TO INTERVENE

EDPRNA is a Delaware limited liability company that develops, owns, and operates, through wholly or partially-owned subsidiaries, wind-powered electric generation facilities throughout the United States. Three subsidiaries of EDPRNA own wind-powered electric generation facilities that currently are interconnected to the transmission system owned and operated by BPA:

- Arlington Wind Power Project LLC, the owner of a 103 MW wind-powered electric generation facility located in Gilliam County, Oregon;
- Sagebrush Power Partners, LLC, the owner of a 101 MW wind-powered electric generation facility located in Kittitas County, Washington; and
- Wheat Field Wind Power Project LLC, the owner of a 97 MW wind-power electric generation facility located in Gilliam County, Oregon

These projects and their offtaker arrangements are dependent on transmission service and certain ancillary services on the BPA system. Through its subsidiaries, EDPRNA also currently holds 172 MW of transmission service reservations on the BPA system. As the upstream owner and developer of wind generation projects that rely on and have reserved transmission capacity on the BPA system, EDPRNA is directly affected by the rate adjustments that are the subject of this proceeding. EDPRNA has a substantial and direct interest in the outcome of this proceeding that

cannot be adequately represented by any other party. Accordingly, EDPRNA respectfully requests that it be permitted to intervene in this proceeding as a party with full rights.

IV. CONCLUSION

WHEREFORE, for the reasons set forth herein, EDPRNA respectfully requests that it be permitted to intervene with full rights to participate as a party to this proceeding.

Respectfully submitted,

/s/ Jessica C. Friedman

Margaret A. Moore

Jessica C. Friedman

Van Ness Feldman, LLP

1050 Thomas Jefferson St., NW

Washington, DC 20007

Tel: (202) 298-1800

Fax: (202) 338-2416

Counsel for EDP Renewables North America LLC

November 15, 2012

CERTIFICATE OF SERVICE

I hereby certify that that I have this day served a copy of the foregoing Petition to Intervene of EDP Renewables North America LLC upon the party listed below via e-mail:

Mr. Allen Chan
LT-7, Office of the General Counsel
905 NE 11th Ave.
Portland, Oregon 97232
acchan@bpa.gov

Dated at Washington, D.C. this 15th day of November, 2012.

/s/ Jessica C. Friedman
Jessica C. Friedman
Van Ness Feldman, LLP
1050 Thomas Jefferson St., NW
Washington, DC 20007
Tel: (202) 298-1800
Fax: (202) 338-2416