

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

**PROPOSED CHANGES TO THE
INTERCHANGE ENERGY
IMBALANCES RATE UNDER THE
PACIFIC NORTHWEST
COORDINATION
AGREEMENT (PNCA)**

File No. PNC-14
(Identified as PNCA-14 in the June 30 Federal Register Notice)

**PETITION TO INTERVENE OF PUGET
SOUND ENERGY, INC.**

Pursuant to the notice posted in the Federal Register on June 30, 2014, regarding the Bonneville Power Administration (“BPA”) Proposed Changes to the Interchange Energy Imbalances Rate Under the Pacific Northwest Coordination Agreement (PNCA), 79 Fed. Reg. 36794 (2014) (the “June 30 Federal Register Notice”), and section 1010.4 of the Rules of Procedure Governing Bonneville Power Administration Rate Hearings, 51 Fed. Reg. 7611 (1986), Puget Sound Energy, Inc. (“PSE”) hereby files this Petition to Intervene as a party in these proceedings. PSE requests that it be granted party status in File No. PNC-14, including any subdockets to that proceeding.

I. PETITION TO INTERVENE

BPA is holding a proceeding, File No. PNC-14, and describes the proceeding as follows:

The sole purpose of this proceeding is to propose a replacement for the index used to price the balance of interchange energy exchanged between pairs of parties to the PNCA. Dow Jones ceased publication of the Dow Jones Mid-C Index in 2013 so currently there is no index to price this energy. BPA is proposing to substitute the Intercontinental Exchange Mid-C Index for the Dow Jones index. In addition to replacing the Dow Jones Index, BPA is also proposing to place a floor of \$0.00/MWh for

energy provided for the Interchange Energy imbalances. The purpose of the floor is to avoid having a PNCA party pay another PNCA party when it provides Interchange Energy during periods when Intercontinental Exchange has negative prices.

79 Fed. Reg. at 36795.

PSE is a corporation created and organized under the laws of the State of Washington with its principal office in Bellevue, Washington. PSE is an investor-owned utility engaged in, among other things, the business of generating, transmitting, and distributing electric power to wholesale and retail customers in Washington. PSE can contract directly with BPA for the purchase or exchange of power under sections 5(b) or 5(c) of the Northwest Power Act. PSE is also a transmission or control area services customer, is a party to the PNCA, and will be affected by the Interchange Energy Imbalances rate to be adopted in the above PNC-14 proceeding. Accordingly, PSE has an interest in this proceeding and is eligible to be a party in this proceeding. *See* 79 Fed. Reg. at 36795. PSE's interest will not be represented adequately by any other party. PSE respectfully requests that it be allowed to intervene as a party in the above-captioned proceeding.

II. COMMUNICATIONS

All materials and communications relating to these proceedings should be served on the following:

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III. CONCLUSION

For the foregoing reasons, PSE respectfully requests that it be allowed intervene in BPA File No. PNC-14, including any subdockets, as a party.

DATED: July 10, 2014

PERKINS COIE LLP

By: 

Donald G. Kari
Jason Kuzma

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CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing Petition to Intervene of Puget Sound Energy, Inc. upon the individuals listed below via email and by regular mail properly addressed and with postage prepaid:

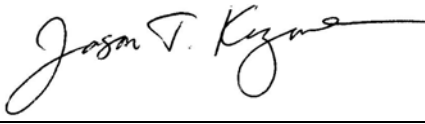
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DATED: July 10, 2014

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