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

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FISCAL YEAR 2020-2021 PROPOSED POWER AND TRANSMISSION RATE ADJUSTMENTS

BPA Docket No. BP-20

PETITION TO INTERVENE OF THE CITY OF LOS ANGELES DEPARTMENT OF WATER AND POWER

Pursuant to the Federal Register Notice dated December 6, 2018 (83 Fed. Reg. 62,849) and Section 1010.6 of the Bonneville Power Administration's ("BPA") Rules of Procedure, the City of Los Angeles acting by and through the Department of Water and Power ("LADWP") hereby files this petition to intervene as a formal party in this proceeding.

I. PETITION TO INTERVENE

The City of Los Angeles is a municipal corporation and charter city organized under the provisions of the California Constitution. California Constitution Art. 11 §§ 2, 3, and 5, Los Angeles Charter § 101. LADWP is a municipal and a proprietary department of the City of Los Angeles that supplies water and power to Los Angeles' inhabitants pursuant to the Los Angeles City Charter. Los Angeles City Charter §§ 600(a), 601, 670. LADWP is a vertically integrated utility that owns generation, transmission, and distribution facilities.

LADWP is a transmission customer of BPA. LADWP owns variable energy resources in the Pacific Northwest and has firming and shaping contracts with third parties to deliver energy to LADWP's load utilizing the Southern Intertie. LADWP thus

BP-20-S-LA-01

has a unique interest in this proceeding that cannot otherwise be represented by other

parties in this proceeding.

II. NAME AND ADDRESS OF PETITIONER

Los Angeles Department of Water and Power c/o Syndi Driscoll, Deputy City Attorney Los Angeles Dept. of Water & Power 221 N. Figueroa Street, Suite 1000 Los Angeles, CA 90012

III. PERSONS ON WHOM SERVICE IS TO BE MADE

LADWP requests that service in this proceeding be made on the following

individuals:

Syndi Driscoll Deputy City Attorney Los Angeles Department of Water and Power 221 N. Figueroa Street, Suite 1000 Los Angeles, CA 90012 (213) 367-4363 Syndi.Driscoll@LADWP.com

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IV. CONCLUSION

For the foregoing reasons, LADWP respectfully requests that it be allowed to intervene in the BPA Docket No. BP-20, including any subdockets, as a formal party.

Respectfully submitted,

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COUNSEL FOR LADWP

Dated: December 11, 2018