

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

Bonneville Power Administration	)	Docket No. BP-20
FY 2020-2021 Proposed Power and	)	
Transmission Rate Adjustments	)	

**PETITION TO INTERVENE AS A PARTY OF  
TRANSMISSION AGENCY OF NORTHERN CALIFORNIA**

Pursuant to Section 1010.6 of the Bonneville Power Administration’s (“BPA”) Rules of Procedure Governing BPA Proceedings and the notice published in the Federal Register on December 6, 2018, 83 FR 62849 (2018), the Transmission Agency of Northern California (“TANC”) submits this Petition to Intervene as a party in this proceeding.

**I. PETITION TO INTERVENE**

TANC is a joint exercise of powers agency organized and existing under the laws of the State of California and is a “municipality” as defined in Section 3(7) of the Federal Power Act, 16 U.S.C. § 796(7) (2012). Among TANC’s purposes is the provision of electric transmission facilities and services for the use of its Members.<sup>1</sup> TANC is the largest Participant in, and the Project Manager of, the California-Oregon Transmission Project (“COTP”), a 500 kV transmission project extending from the California-Oregon border to near Pacific Gas and

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<sup>1</sup> TANC’s Members are the California cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah; the Sacramento Municipal Utility District (“SMUD”); the Modesto Irrigation District; and the Turlock Irrigation District (“Turlock”). The Plumas-Sierra Rural Electric Cooperative is an associate member of TANC.

Electric Company's ("PG&E") Tesla Substation in central California. The COTP is part of the high voltage facilities that comprise an electrical path spanning the Pacific Northwest and northern California. Energy flowing to or from the BPA transmission system may utilize the COTP for transactions involving California.

The BP-20 rate proceeding will establish, among other things, power and transmission rate adjustments for power, transmission, ancillary, and control area services rates for the FY2020-2021 rate period. These rates may effect transactions involving the COTP and the BPA transmission system. In addition, as a petitioner (along with TANC Members SMUD and Turlock) to a pending appeal in Ninth Circuit Case No. 18-71753 pertaining to BPA's approval in BPA Docket No. BP-18 of rates for hourly transmission service on the Southern Intertie, TANC has a particular interest in the Southern Intertie hourly rates proposed in the BP-20 proceeding. Accordingly, TANC has a substantial interest in this proceeding because it will be directly and substantially affected by any determination regarding the proposed rates. No other party can adequately represent TANC's interests in this proceeding. TANC, therefore, has good cause to intervene in the BP-20 proceeding, and such intervention is in the public interest.

## **II. COMMUNICATIONS**

TANC requests that the following names be added to the official service list for this proceeding and that service be directed to:

Michael Postar  
 Bhaveeta K. Mody  
 Duncan, Weinberg, Genzer  
 & Pembroke, P.C.  
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### III. CONCLUSION

TANC respectfully requests that this Petition to Intervene in the BP-20 proceeding be granted and that it be made a party to this proceeding and that its designated representatives be added to the service list.

DATED: December 11, 2018

Respectfully submitted,

/s/ Michael Postar

Michael Postar

Bhaveeta K. Mody

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Special Counsel to Transmission Agency  
Of Northern California

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing by uploading it to BPA's Secure Website. Pursuant to Section 1010.10(a) of BPA's Rules of Procedure, such filing constitutes service on all Litigants.

DATED this 11th day of December, 2018.

/s/ Harry A. Dupre

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