

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

In the Matter of:)	BPA File No. BP-20E
)	
SUSPENSION OF THE FINANCIAL RESERVES POLICY SURCHARGE)	PETITION FOR LEAVE TO INTERVENE AND STATEMENT OF SUPPORT
_____)	

**PETITION FOR LEAVE TO INTERVENE AND STATEMENT OF SUPPORT
BY THE WESTERN PUBLIC AGENCIES GROUP**

Pursuant to the Federal Register Notice published on June 22, 2020, 85 Fed. Reg. 37,444 (2020), and the Bonneville Power Administration’s Rules of Procedure, 83 Fed Reg. 39,9993 (2018), each of the utilities that comprise the Western Public Agencies Group (“WPAG”)¹ hereby individually file this Petition for Leave to Intervene in the above captioned matter, each as a party of right. In support of this Petition, the following information is provided.

I.

Each of the utilities that comprise WPAG currently purchases wholesale power and transmission services from the Bonneville Power Administration (“BPA”) under rates that will be affected by the proposed suspension of the Financial Reserves Policy (“FRP”) Surcharge, and will continue to do so during the period when the suspension of the FRP Surcharge would be in effect if the proposal is adopted. For this reason, any decision regarding whether to suspend the FRP Surcharge will directly affect the WPAG utilities and the end-use consumers they serve. No other party to this proceeding will adequately represent the interests of each of the WPAG utilities.

¹ The utilities that comprise WPAG are listed on Attachment A hereto.

II.

Each of the twenty-two WPAG member utilities is a Petitioner in its own right. For efficiency purposes, they have consolidated their individual Petitions for Leave to Intervene into this one Petition. Joint filings among parties with common interests or positions, like this Petition, are encouraged under the Rules of Procedure. *See* Section 1010.7. Accordingly, WPAG respectfully requests that all materials, documents, and communications relating to the above-captioned proceeding be served on the following on behalf of all the WPAG utilities:

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WPAG further requests that all materials, documents, and communications relating to the above-captioned proceeding also be served on the following individual WPAG members as follows:

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III.

The WPAG utilities hereby reaffirm their support for BPA’s proposal to suspend the FRP Surcharge for the remainder of the BP-20 rate period as well as their support for BPA’s proposal to use an expedited schedule in this rate proceeding. We agree with BPA that “suspending the FRP Surcharge [would be] a meaningful step in providing immediate and substantive relief [to BPA’s power customers and the end-use customers they serve] during a time of regional and national crisis without jeopardizing [BPA’s] longer-term financial health.” *Fisher and Fredrickson*, BP-20E-E-BPA-01 at 3, lines 20-23.

Indeed, it is the view of the WPAG utilities that suspending the FRP surcharge will not only not jeopardize BPA’s longer-term financial health but will instead enhance it. BPA’s financial health is deeply associated with (i) the financial health of its power customers and (ii) BPA’s long-term relationship with them. Even a cursory review of the reports issued by the credit rating agencies regarding BPA indicates that these two factors are chief in their analyses of

BPA's financial wherewithal and in support of the credit ratings they issue for BPA. Immediate suspension of the FRP Surcharge during this moment of crisis would simultaneously boost both factors by strengthening BPA's relationship with its most important customer group while also improving that customer group's financial health when they need it most. While such benefits may not be as easily quantified as the increased revenue that BPA would derive if it maintained the FRP Surcharge for the remainder of the BP-20 rate period, over 80-years of Northwest public power and BPA collective history recommends that they will be of more consequence to the agency's long-term financial health. For this, and the other reasons stated above, the WPAG utilities support, and are thankful for, BPA's proposal to suspend the FRP Surcharge.

WHEREFORE, based on the foregoing, each of the utilities that comprise the WPAG respectfully requests party status in the above-captioned proceeding.

Dated this 22nd day of June, 2020.

MARSH MUNDORF PRATT SULLIVAN + McKENZIE,
P.S.C.

/s/ Ryan S. Neale
Ryan S. Neale
Attorney for the Western Public
Agencies Group

ATTACHMENT A

The utilities that comprise the Western Public Agencies Group are Eugene Water & Electric Board, Benton Rural Electric Association, the Cities of Port Angeles, Ellensburg and Milton, Washington, the Towns of Eatonville and Steilacoom, Washington, Alder Mutual Light Company, Elmhurst Mutual Power and Light Company, Lakeview Power & Light, Ohop Mutual Light Company, Parkland Light and Water Company, Public Utility Districts No. 1 of Clallam, Clark, Cowlitz, Grays Harbor, Kittitas, Lewis, Mason, and Skamania Counties, Washington, Public Utility District No. 3 of Mason County, Washington and Public Utility District No. 2 of Pacific County, Washington.

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2020, I electronically filed the foregoing by uploading it to the Bonneville Power Administration's secure website. Pursuant to Section 1010.10(a) of the Rules of Procedure of the Bonneville Power Administration, such filing constitutes service on all Litigants.

Submitted by,

/s/ Ryan S. Neale

Ryan S. Neale
Attorney for the Western Public
Agencies Group