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

2022 Power and Transmission Rate Proceeding

BPA Docket No. BP-22

## PETITION TO INTERVENE OF

# NEWSUN ENERGY TRANSMISSION COMPANY LLC

Pursuant to the notice appearing in the Federal Register Vol. 85, No. 231 on December 1, 2020, and Rule 1010.6 of the Bonneville Power Administration's (BPA) Rules of Procedure (September 12, 2018), the NewSun Energy Transmission Company LLC (NewSun) respectfully petitions to intervene as a party in this proceeding. NewSun provides the following:

# I. WAIVER REQUEST

Pursuant to Rule 1010.1(e), NewSun also requests waiver of Rules 1010.6(c) and 1010.10 to permit NewSun's late intervention. NewSun has not intervened in a BPA rate case previously and experienced some technical difficulty creating an account and accessing the secure website on the day interventions were due in this case. NewSun's interests are not adequately represented by existing parties. Given that this intervention is late only because it is filed after 4:30 on the same day as the intervention deadline, it will not disrupt the proceeding or prejudice other parties. As such, good cause exists to grant this late intervention.

### II. BACKGROUND

NewSun is a Delaware limited liability company that "directly purchase[s] power or transmission services under Bonneville's rate schedules," BPA Rules of Procedure § 1010.6(b).

Therefore, NewSun has a substantial interest in and will be directly affected by the outcome of this proceeding, and there is no other party that can adequately represent the interests of NewSun.

# III. COMMUNICATIONS

All communications concerning this filing should be addressed to the following individuals, who should be included on the official service list:

Jacob H. Stephens Marie P. Barlow

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### IV. PETITION TO INTERVENE

NewSun therefore respectfully requests that the BPA grant this Petition to Intervene.

Dated this 8th day of December 2020.

Respectfully submitted, NewSun Energy Transmission Company LLC

/s/ Marie P. Barlow

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