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8 BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

9
10 In the Matter of
Application No. 2009-01

11 WHISTLING RIDGE ENERGY, L.L.C.

12
13 WHISTLING RIDGE ENERGY PROJECT
14

Application No. 2009-01

Skamania County Public Utility District No.
1 Petition for Intervention

15
16 **A. INTRODUCTION OF PETITIONER**

17 Skamania County Public Utility District No. 1, (“PUD”) hereby submits its petition to
18 intervene in support of Whistling Ridge Energy, L.L.C. in this matter under the authority of RCW
19 34.05.443, WAC 463-30-091, and the June 24, 2009 Notice of Opportunity and Closing Date to File
20 Petitions for Intervention issued by the Energy Facility Site Evaluation Council. The PUD has a
21 critical interest in these proceedings and their outcome, as it is the only provider of electrical service
22 in the county and as such, is a participant in and directly dependent on the generation sources and
23 network of transmission lines that enable us to deliver such service. This project will have important
24 impacts upon the PUD’s continuous access to electrical service in the area, an interest that will be
25 impaired if the PUD is not granted Intervenor status. For these reasons, it is respectfully submitted
26 that intervention in this matter should be granted to the Skamania County PUD.

1 **Petitioner Information:**

2 Skamania County Public Utility District No. 1
3 1492 Wind River Highway
4 Carson, WA 98610
5 (509) 427-5126 (phone)
6 (509) 427-8416 (facsimile)

7 **B. PETITIONER'S INTEREST**

8 Skamania County Public Utility District No. 1 is a customer-owned utility providing electric
9 service in Skamania County. It also has two water systems serving customers in Carson and
10 Underwood, Washington. Public Utility District #1 of Skamania County is a municipal corporation
11 formed in 1938 under the laws of the state of Washington

12 The PUD's interest in these proceedings is reliability insofar as its ability to serve its
13 customers. The PUD's source of power is the Bonneville Dam, specifically the old powerhouse on
14 the Oregon side. Once the transmission lines that serve the PUD reach North Bonneville, they
15 converge into a single tap that travels east, supplying the Stevenson, Carson and Underwood
16 substations, terminating at the Bald Mountain substation in Klickitat County. The Klickitat County
17 Bald Mountain Substation is located very close to the powerhouse at the Condit Dam on the White
18 Salmon River. It is here that reliability becomes a concern for the PUD.

19 Skamania County PUD gets its backup power from the east through Condit Dam, which
20 supports both Klickitat County PUD and backup to Bald Mountain. In the past, the PUD also got
21 alternate power from the Powerdale Dam in Hood River, Oregon. However, the Powerdale dam
22 ceased operations in late 2006 when its water intake was washed out by flooding. This leaves the
23 PUD reliant on the Condit Dam powerhouse as its backup generation source. Condit Dam is slated
24 for removal. When this dam is removed, there will be insufficient alternate backup power to serve
25 both Klickitat County and Skamania County. A simple schematic depicting the transmission layout
26 for the PUD is attached hereto as Exhibit A.

 To the west of the Stevenson Substation is the Rock Creek area, through which the
transmission line that supplies Stevenson, Carson and Underwood runs. The Rock Creek area where

1 the transmission towers and lines are sited is geologically unstable, and has experienced a series of
2 slides in recent years. In the event a slide takes out Rock Creek transmission towers, the only source
3 of backup power to Stevenson, Carson and Underwood is to the east through Condit Dam. The
4 removal of Condit Dam removes the PUD's alternate feed, and presents the very real potential that
5 Skamania County's three communities lose power for a considerable period of time. Additionally,
6 the communities of Underwood and Carson will be without water, because those distribution
7 systems are electricity-dependent. The potential lack of a reliable backup feed to the PUD presents a
8 very real public health and human safety concern.

9 The Whistling Ridge project presents an opportunity for the PUD to obtain backup
10 reliability once Condit Dam is removed. The Whistling Ridge project includes a proposal for
11 construction of a substation attached to a 230 kV transmission line, which is in a common corridor
12 with the 115 kV line that supplies Skamania County. Construction of that substation will include a
13 ring bus with four sides. One of the four sides has unassigned capacity. The PUD could put a circuit
14 breaker in the fourth side, install a 230 kV to 115 kV transformer, and run a line out to connect to
15 the 115 kV line. This would provide the reliability that the PUD will lose once the Condit Dam is
16 removed.

17 C. LEGAL ARGUMENT

18 Intervention in these proceedings may be sought upon written request to EFSEC. In such
19 an event, intervention "shall be allowed to any person upon whom a statute confers a right to
20 intervene and, in the discretion of the council, to any person having an interest in the subject matter
21 and whose ability to protect such interest may be otherwise impaired or impeded. WAC 463-30-
22 091. The Skamania County PUD has an absolutely critical interest in the subject matter of the
23 Whistling Ridge energy project. The PUD's ability and duty to serve its customers, including a
24 backup system of reliability in the event of catastrophic power loss, is unique to the PUD, and is one
25 that is not and cannot be represented by other parties to the EFSEC proceeding. The PUD's ability
26 to protect that interest in obtaining redundancy and reliability for its system would be significantly

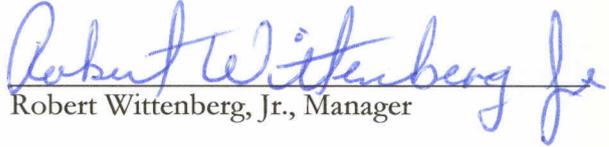
1 impaired if its participation were not allowed in this proceeding. The PUD's participation in these
2 proceedings will neither unduly delay proceedings nor will it impair the rights of the existing parties.

3 **CONCLUSION**

4 Skamania County Public Utility District No. 1 respectfully and firmly seeks that its petition
5 for intervention in this matter be granted by the Energy Facility Site Evaluation Council. The
6 outcome of this decision on intervention, and the entire proceeding, is one that is critical to not only
7 the PUD but its citizens who are dependent on the PUD for reliable, continuous provision of
8 electrical service not only as a matter of convenience but as a matter of the public's health, safety
9 and welfare.

10 RESPECTFULLY SUBMITTED this 10th day of July, 2009.

11 SKAMANIA COUNTY PUBLIC UTILITY
12 DISTRICT NO. 1

13 
14 Robert Wittenberg, Jr., Manager

1 **VERIFICATION**

2 Robert Wittenberg, Jr. states and declares as follows:

3 I am the Manager of Skamania County Public Utility District No. 1, which seeks intervention
4 in this matter by this Petition. I have personal knowledge of the facts in this declaration and am
5 competent to testify to those facts in legal and administrative proceedings.

6 I have read the foregoing Petition for Intervention. I verify that the factual allegations in the
7 Petition for Intervention are true, and request that the Petition for Intervention be granted.

8 I declare under penalty of perjury under the laws of the State of Washington that the
9 foregoing is true and correct.

10 EXECUTED at Stevenson, Washington, this 10th day of July, 2009.

11 Robert Wittenberg Jr.
12 Robert Wittenberg, Jr.
13

14 SUBSCRIBED AND SWORN to before me this 10th day of July, 2009.

15 Kelly Tennison
16 (Signature of Notary)

17 Kelly Tennison
18 (Legally Print Name of Notary)



19 Notary public in and for the State of Washington,
20 Residing at North Bonneville
21 My appointment expires 1/23/2010

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July, 2009, I served a true copy of the foregoing *Skamania County Public Utility District No. 1's Petition for Intervention* on the following named person(s) by the following method:

Mailing/ U.S. first-class postage prepaid

Allen J. Fiskdal
EFSEC Manager
Energy Facility Site Evaluation Council
905 Plum Street SE, 3rd Floor
PO Box 43172
Olympia, WA 98504-3172

Kyle Crews
Assistant Attorney General
Office of the Attorney General
PO Box 40108
Olympia, WA 98504-0108

Email: allenf@cted.wa.gov
Phone: 360-956-2152/Fax: 360-956-2158

Email: KyleC@atg.wa.gov
Phone: 360-664-2510/Fax: 360-586-3593

Of Attorneys for EFSEC

H. Bruce Marvin
Assistant Attorney General
Counsel for the Environment
Office of the Attorney General
PO Box 40100
Olympia, WA 98504-0100

Email: BruceM1@atg.wa.gov
Phone: 360-586-2438 M-W/206-389-3840 Th-F
Fax: 360-664-0229

Counsel for the Environment

DATED: July 14, 2009.

STOEL RIVES LLP

Erin L. Anderson,
WSBA No. 23282
elanderson@stoel.com

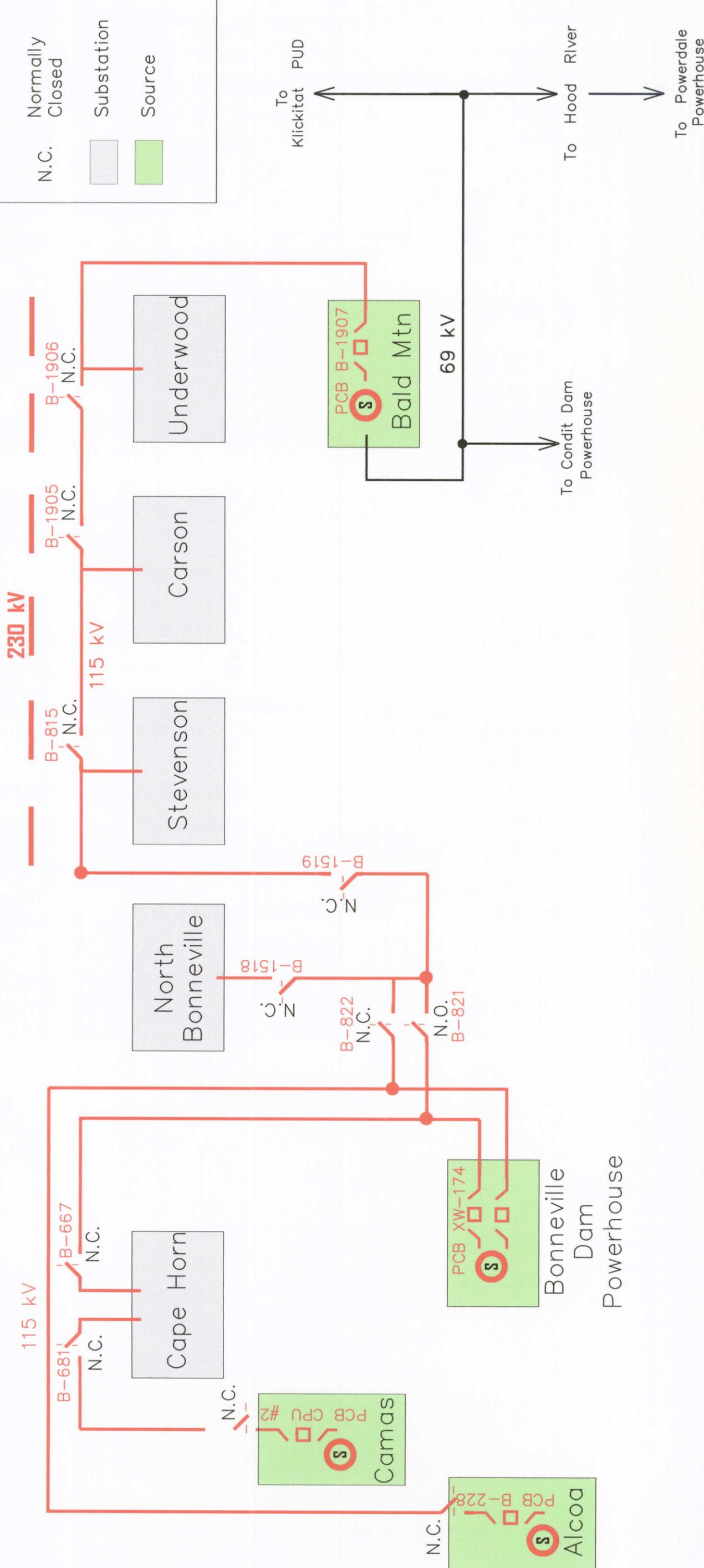
Attorneys for Whistling Ridge Energy, LLC
Applicant

STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480

BPA Line Routing

Legend

-  BPA source
-  BPA 115 kV
-  BPA switch
- N.C. Normally Closed
-  Substation
-  Source



June, 2009

Skamania PUD

BPA Line Routing