

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**SPIEDEN CHANNEL TIDAL  
ENERGY PROJECT – PUBLIC  
UTILITY DISTRICT NO. 1 OF  
SNOHOMISH COUNTY,  
WASHINGTON**

Project No. 12689-000

**Pomona Grange #50 San Juan County WA  
MOTION TO INTERVENE**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission’s (FERC or Commission) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, .214, the Pomona Grange #50 San Juan County WA (SJC-Grange) moves to intervene in the above-referenced proceedings. The grounds for this motion are:

**I.**

Rural infrastructure issues have been of long-standing concern to the Grange. These issues include electrical generation and transmission infrastructure and ownership, affordable access to quality rural telephony and broadband internet services, health care and transportation.

**II.**

The manner of incorporation, the pursuits of the Grange and use of the term, are codified in Washington State law, **Chapter 24.28 RCW**. The service territory of the SJC Grange includes the membership of the three subordinate Granges in San Juan County, WA that are located on the islands of Orcas, Lopez and San Juan, adjacent to and within the county of the proposed project. The Grange is a 147 year old membership-based rural policy organization. The Grange has a strong grass roots base in 38 states, a

national membership exceeding 300,000 with over 40,000 in Washington State. The Washington State Grange was established two months prior to statehood.

The Grange has been an active community based organization in San Juan County for over seventy years. Thousands of local residents have been members of the three Grange Halls on San Juan, Orcas and Lopez islands across the generations. Grange organizations in Washington State actively promoted rural electrification in the 1920s, which led to the establishment of the Orcas Power and Light Cooperative, a local power utility owned by ratepayer members in the 1930s. Grange members in San Juan County are also OPALCO members, with interests not only in keeping electrical rates affordable but also in looking to the future toward renewable power sources that reduce dependency on foreign oil as well as minimizing the environmental impacts of power generation. State laws created by the Grange Power Bill remains on the books as one of the strongest and most unique public power laws in the nation. The Snohomish County PUD is a direct product of the Grange Power Bill. The law is unique because it provides for the establishment of municipal corporations that encompass the strongest elements of private corporations, rural electric cooperatives and municipal utility systems. A PUD has the basic business structure of a private corporation, with a board of commissioners who serve in the same capacity as a board of directors. A PUD combines the public interest benefit of a nonprofit operation with low cost public financing methods of a municipal system. Third, a PUD incorporates the area coverage concept in utility service, as practiced and promoted by the rural electric cooperatives. Given the Spieden Channel site location of the application, it is highly likely that the local rural electric cooperative, OPALCO will become the distribution entity for any future ocean energy generated in the area.

Pursuant to the above statutory authorizations, established legislative interests and local concerns that renewal electrical generation be made available to the citizens of San Juan County and local member owners of OPALCO, SJC-Grange brings this motion to intervene.

### **III.**

Public Utility District No. 1 of Snohomish County, Washington filed a Preliminary Permit Application pursuant to Federal Power Act, 16 U.S.C. §§ 791(a) – 825(r), for the project known as the Spieden Channel Tidal Energy Project.

### **IV.**

The proposed Spieden Channel Tidal Energy Project would be located in Spieden Channel between San Juan Island and Spieden Island, in San Juan County, Washington. The proposed Spieden Channel Tidal Energy Project would consist of: (1) 168 Tidal In Stream Energy Conversion (TISEC) devices consisting of, (2) rotating propeller blades 20 meters in diameter, (3) integrated generators with a capacity of 50 kW, (4) anchoring systems, (5) mooring lines, and (6) interconnection transmission lines. The project is estimated to have an annual generation of 32.47 gigawatt-hours per-year, which would be distributed by the Snohomish County Public Utility District No. 1.

### **VI.**

For the above reasons, SJC-Grange has a significant interest which may be directly affected by the outcome of these proceedings, and this interest is not adequately represented by existing parties. The participation of SJC-Grange in these proceedings is in the public interest.

**VII.**

THEREFORE, in order that these proceedings be fully developed in accordance with the applicable law and that the Commission have before it all the material facts relating to these projects, the Commission should grant the SJC-Grange intervenor status.

As a party in the above-entitled proceedings, SJC-Grange requests the right to have notice of and appear at any and all hearings or proceedings, to be heard through written and oral argument, to be served with copies of all pleadings, applications, and notices.

**V.**

The names and addresses of the contacts for SJC-Grange are listed below. Copies of all orders, notices, pleadings, and correspondence related to this proceeding should be directed to:

Richard Civile  
Legislative Chairperson  
San Juan County Pomona Grange # 50  
152 1st St N  
Friday Harbor WA 98250

Email: [Pomona@islandgrange.org](mailto:Pomona@islandgrange.org)  
Phone: 360 378-6632

Submission Contents

Motion/Notice of Intervention of San Juan County Pomona Grange #50 under  
P-12689.

SJC\_Grante\_MOI.pdf..... 1-4