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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

SAN JUAN CHANNEL TIDAL ENERGY
PROJECT

PROJECT NO. 12692-000

SAN JUAN COUNTY'S MOTION TO
INTERVENE

I. INTRODUCTION

Pursuant to Rules 210 and 214 of the Federal Energy Regulatory Commission ("Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.210 and .214, San Juan County ("the County") hereby moves for leave to intervene in the above-captioned proceeding. The County is filing this motion for intervention in response to the June 22, 2006, Notice of Application Accepted for Filing and Soliciting Motions to Intervene, Protests and Comments in FERC Project No. 12692-000. In support of the motion, the County respectfully states as follows:

II. COMMUNICATIONS

All correspondence, communications, pleadings and other documents related to this proceeding should be addressed to:

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SAN JUAN COUNTY'S MOTION TO INTERVENE - 1

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With Copies to:

P. Stephen DiJulio
Joseph A. Brogan
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1111 Third Avenue, Suite 3400
Seattle, Washington 98101
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Facsimile: (206) 749-1935
E-mails: DIJUP@Foster.com; BROGJ@Foster.com

The County requests that each of the individuals identified above be placed on the Commission's official service list in this proceeding and hereby consents to receiving such service electronically.

III. BACKGROUND OF THIS PROCEEDING

Public Utility District No. 1 of Snohomish County, Washington ("Snohomish PUD") filed a notice of application pursuant to the Federal Power Act, 16 U.S.C. §§ 791(a) -825(r), for a project known as the San Juan Channel Tidal Energy Project ("Project"). Snohomish PUD filed an application for a preliminary permit for a proposed tidal energy project that would consist of: (1) 116 Tidal In Stream Energy Conversion (TISEC) devices consisting of rotating propeller blades twenty meters in diameter; (2) integrated generators with a capacity of 46 kW; (3) anchoring systems; (4) mooring lines; and (5) interconnection transmission lines. The proposed project is estimated to have an annual generation of 33.27 gigawatt-hours per year. The Project is proposed to be located in San Juan Channel which is located within San Juan County in the State of Washington.

IV. INTERESTS OF THE INTERVENOR JUSTIFYING INTERVENTION

The County is a Washington municipal corporation formed under the laws of the State of Washington. The County's jurisdiction extends into and over the waters of San Juan Channel. RCW 36.04.280.

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The County has significant public and regulatory interests in the issues before the Commission. The interest of the County as the public agency with delegated authority to implement the State Shoreline Management Act of 1971 along the shorelines of San Juan Channel, to implement and enforce local water quality, water resources, critical areas and fish and wildlife resources regulations and related policies along the shorelines of San Juan Channel, and to provide for the safety, health and welfare of its citizens is not adequately represented by any other party in this proceeding. It is in the public interest that the local government charged with compliance with these various laws, regulations and policies be heard before the Commission on matters that affect those interests.

The County has the authority to grant franchisees the right, privilege and authority to set, erect, construct, support, attach, connect, and locate utilities facilities, including Project facilities in, upon, over, under, along, across and through the County for the purpose of transmission, distribution and sale of energy. To that extent, the County has a vested interest in ensuring compliance with all local laws related to the development, construction, and operation of energy facilities or franchises within the County.

In light of the County's jurisdiction over Project areas depicted in the Application and its regulatory obligations, the County desires to monitor and stay informed about the nature of the Project and to participate herein to the full extent authorized under the Commission rules.

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V. MOTION TO INTERVENE

Therefore, good cause having been shown, the County respectfully requests pursuant to Commission rules that it be permitted to intervene in the above-entitled proceedings and be made a party thereto. It requests the right to have notice of and appear at any and all hearings or proceedings, to produce evidence and cross-examine witnesses, to be heard through counsel through written and oral argument, to be served henceforth with copies of all pleadings, applications and notices, and for such other participation and relief as may be appropriate under Commission rules.

RESPECTFULLY SUBMITTED this 18th day of August 2006.

SAN JUAN COUNTY
Randall K. Gaylord, WSBA No. 16080
San Juan County Prosecuting Attorney

FOSTER PEPPER PLLC



P. Stephen DiJulio, WSBA No. 7139
Joseph A. Brogan, WSBA No. 30664
Special Deputy Prosecuting Attorneys for San Juan County

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

SAN JUAN CHANNEL TIDAL ENERGY
PROJECT

PROJECT NO. 12692-000

San Juan County's
Motion to Intervene

CERTIFICATE OF SERVICE

I hereby certify that I have this day served, via e-mail or via U.S. Postal Service, the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 18th day of August, 2006.



Helen M. Stubbert, Legal Assistant to
Joseph A. Brogan, Counsel for
San Juan County

Contacts listed with '**' must be postal served

Service List for P-12692-000 PUD #1 of Snohomish County, WA

Party	Primary Person or Counsel of Record to be Served	Other Contact to be Served
Attorney General Office WDFW	William Frymire Senior Counsel Washington Attorney General's Office PO Box 40100 Olympia , WASHINGTON 98501 UNITED STATES billf@atg.wa.gov	Gary R. Sprague Major Projects Section Manager Washington Department of Fish & Wildlife Habitat Program 600 Capitol Way N Olympia , WASHINGTON 98501-1091 UNITED STATES spraggrs@dfw.wa.gov
Friends of the San Juans	Amy E Trainer PO Box 1344 Friday Harbor , WASHINGTON 98250 UNITED STATES amy@sanjuans.org	
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