

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

Shanker's Bend Hydroelectric Project  
FERC Project No. P-12804

**CENTER FOR ENVIRONMENTAL LAW & POLICY'S MOTION TO  
INTERVENE AND PROTEST**

Submitted October 4, 2007

The Center for Environmental Law & Policy (hereinafter known as CELP) requests intervention in the Federal Energy Regulatory Commission's (hereinafter known as the Commission) review of the application for the preliminary permit for the Shanker's Bend Hydroelectric Project.

CELP is a public interest non-profit corporation registered in the State of Washington. CELP's members live, work, recreate, aesthetically enjoy, and use the waters in and along Washington's streams and rivers, including those in Okanogan County. The motto "Clean, Flowing Waters for Washington" summarizes CELP's mission to protect and restore the natural integrity, sustainability, and enjoyment of the State's water resources. CELP's goals include furthering the development of sound and effective water management strategies that will benefit the public and the wildlife that depend on clean, flowing, and sustainable water resources.

The Commission's review and potential approval of the Shanker's Bend Hydroelectric Project will impact the interests of CELP and its members. CELP is highly involved in Okanogan County and has taken actions to help preserve this unique area of Washington State. No other stakeholder adequately represents CELP's interests and it is therefore crucial that CELP be allowed to intervene. CELP hereby requests intervenor

status in accordance with the requirements of Rules of Practice and Procedure, 18 C.F.R. §§, 385.214, 385.1306; see also 18 CFR 35.8(a), 154.210(a) and (b), 157.210, 157.106, 343.2(a), and 380.10.

Please direct copies of all notices and correspondence related to this proceeding to CELP's legal counsel, M. Patrick Williams, at the address listed below.

Respectfully submitted this 4<sup>th</sup> day of October, 2007.

---

M. Patrick Williams, Staff Attorney  
Center for Environmental Law & Policy  
4000 Aurora Ave N., Suite 222  
Seattle, WA 98103  
pwilliams@celp.org  
(206) 547-5047

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated this 4<sup>th</sup> day of October, 2007.

---

M. Patrick Williams

Submission Contents

|  |     |
|--|-----|
| CELP Motion to Intervene<br>FERCMTIshankers.doc..... | 1-2 |
|--|-----|