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Attorneys for Scatec Solar North America, Inc.

Submitted February 15, 2013

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky
Mountain Power for Approval of Changes to
Renewable Avoided Cost Methodology for
Qualifying Facilities Projects Larger than
Three Megawatts

Docket No. 12-035-100

PETITION TO INTERVENE OF
SCATEC SOLAR NORTH AMERICA,
INC.

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Scatec Solar North America, Inc. ("Scatec Solar NA") respectfully petitions the Public Service Commission of Utah ("Commission") for leave to intervene in the above-captioned docket concerning the application of Rocky Mountain Power for approval of changes to the Renewable Avoided Cost Methodology for Qualifying Facilities Projects larger than three megawatts.

In support of this Petition to Intervene, Scatec Solar NA represents and states as follows:

- 1. Scatec Solar NA develops commercial and utility-scale solar power projects.

 Scatec Solar NA's capabilities include designing, constructing, operating, and maintaining photovoltaic (PV) solar power plants. It is currently developing projects in the Intermountain West, including Utah.
- 2. Scatec Solar NA's legal rights and interests may be substantially affected by this proceeding.
- 3. Intervention by Scatec Solar NA will not unduly broaden the issues or delay the proceeding. Scatec Solar NA's interests are not and cannot be adequately represented by any other party.
 - 4. Notices in this proceeding should be sent to the following:

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WHEREFORE, Scatec Solar NA requests, by and through its counsel, that the Commission enter an Order granting Scatec Solar NA's Petition to Intervene as a party in this Docket.

RESPECTFULLY SUBMITTED this 15th day of February 2013.

SCATEC SOLAR NORTH AMERICA, INC.

/s/ Jerold G. Oldroyd Jerold G. Oldroyd, Esq.

Daniel R. Simon, Esq.

Tesia N. Stanley, Esq.

BALLARD SPAHR LLP

Attorneys for Scatec Solar North America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February, 2013, an original and five (5) true and

correct copies of the foregoing PETITION TO INTERVENE OF SCATEC SOLAR NORTH

AMERICA, INC. were hand-delivered to:

Gary L. Widerburg Commission Secretary Public Service Commission of Utah Heber M. Wells Building, Fourth Floor 160 East 300 South Salt Lake City, UT 84111 psc@utah.gov

and true and correct copies were electronically mailed to the addresses below:

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