

F. ROBERT REEDER (2710)
WILLIAM J. EVANS (5276)
VICKI M. BALDWIN (8532)
PARSONS BEHLE & LATIMER
One Utah Center
201 South Main Street, Suite 1800
Post Office Box 45898
Salt Lake City, UT 84145-0898
Telephone: (801) 532-1234
Facsimile: (801) 536-6111
Attorneys for Kennecott Utah Copper, LLC and
Tesoro Corporation

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	PETITION TO INTERVENE Docket No. 12-035-100
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In accordance with Rule 746-100-7 of the Public Service Commission's ("Commission") Rules of Practice and Procedure and the Provisions of Utah Code Ann. § 63-46b-9, Kennecott Utah Copper, LLC ("Kennecott") and Tesoro Corporation ("Tesoro") (jointly "Parties") request leave to intervene in the above-captioned matter.

In support of this Petition to Intervene, Parties state as follows:

1. On October 9, 2012, PacifiCorp, doing business in Utah as Rocky Mountain Power ("RMP"), requested that the Commission approve certain changes to the currently effective avoided cost pricing for large renewable qualifying facilities ("QF").
2. On November 13, 2013, the Commission issued a scheduling order requiring that interested parties filed their petitions to intervene no later than March 29, 2013.

3. Kennecott currently has two QF contracts with PacifiCorp. One contract is for PacifiCorp's purchase of energy from a cogeneration facility at Kennecott's smelter and the other is for PacifiCorp's purchase of energy from a cogeneration MW facility at Kennecott's refinery. Both contracts run for the period of January 1, 2013, through December 31, 2013. Kennecott anticipates entering new QF contracts with PacifiCorp for these facilities after the expiration of these contracts.

4. Tesoro currently has one QF contract with PacifiCorp for the purchase of energy from a cogeneration facility. This contract runs for the period January 1, 2013 through December 31, 2013. Tesoro anticipates that it will enter a new QF contract with PacifiCorp for this facility after the expiration of this contract.

5. In this proceeding RMP proposes that renewable energy credits should be transferred to RMP when it purchases energy from a QF. This represents a change in RMP's current QF avoided cost pricing policy.

6. RMP also proposes to use the next deferrable thermal resource as the proxy in the Proxy/PDDRR method as it is applied to renewable resources. The proposed pricing method represents a change from the method used to calculate the price RMP is currently paying under the Parties' QF contracts.

7. The Parties' interests will be affected by the Commission's decision in this matter. They have a direct, immediate, and substantial interest in this proceeding, and their interests will not be adequately represented by any other party to this proceeding.

8. If the Parties are granted leave to intervene in this proceeding, they hereby request that service of all pleadings, notices, etc. be made to the following:

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
frreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com

9. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the Parties' Petition to Intervene.

10. The Parties have not yet determined the level of their participation.

11. The Parties request that the Commission grant their intervention as their interests may appear.

WHEREFORE, Kennecott and Tesoro request that the Commission enter an Order granting them permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 7th day of March, 2013.

/s/ Vicki M. Baldwin

F. ROBERT REEDER
WILLIAM J. EVANS
VICKI M. BALDWIN
PARSONS BEHLE & LATIMER
Attorneys for Kennecott Utah Copper, LLC and
Tesoro Corporation

CERTIFICATE OF SERVICE

(Docket No. 08-035-83)

I hereby certify that on this 7th day of March 2013, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION TO INTERVENE** to:

Patricia Schmidt
ASSISTANT ATTORNEYS GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov

David L. Taylor
Yvonne R. Hogle
ROCKY MOUNTAIN POWER
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
dave.taylor@pacificorp.com
Yvonne.hogle@pacificorp.com
Datarequest@pacificorp.com

Paul Proctor
ASSISTANT ATTORNEYS GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Michele Beck
Executive Director
COMMITTEE OF CONSUMER SERVICES
500 Heber Wells Building
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov

William Powell
Dennis Miller
Chris Parker
DIVISION OF PUBLIC UTILITIES
500 Heber Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111

wpowell@utah.gov
dennismiller@utah.gov
ChrisParker@utah.gov

Cheryl Murray
Dan Gimble
UTAH COMMITTEE OF CONSUMER SERVICES
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
cmurray@utah.gov
dgimble@utah.gov

Sophie Hayes
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84111
sophie@utahcleanenergy.org

Ros Roca Vrba
Energy of Utah LLC
P.O. Box 900083
Sandy, UT 84090-0083
rosvrba@energyofutah.onmicrosoft.com

Robert Millsap
Renewable Energy Advisors
P.O. Box 900036
Sandy, UT 84090
bobmillsap@renewable-energy-
advisors.com

Gary A. Dodge
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com

Christine Mikell
Wasatch Wind
4525 S. Wasatch Blvd., Suite 120
Salt Lake City, UT 84124
christine@wasatchwind.com

Brian W. Burnett
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
brianburnett@cnmlaw.com

Ellis-Hall Consultants, LLC
P.O. Box 572098
Murray, UT 84107-6764
mail@ehc-usa.com

Steven S. Michel
Western Resource Advocates
409 E. Palace Ave. Unit 2
Santa Fe, NM 87501
smichel@westernresources.org

Nancy Kelly
Western Resource Advocates
9463 N. Swallow Rd.
Pocatello, ID 83201
nkelly@westernresources.org

Charles R. Dubuc
Western Resource Advocates
150 South 600 East, Suite 2AB
Salt Lake City, UT 84102
rdubuc@westernresources.org

Cynthia Schut
Western Resource Advocates
150 South 600 East, Suite 2AB
Salt Lake City, UT 84102
cindy.schut@westernresources.org

Maura Yates
Sun Edison, LLC
201 Lavaca, Ste #302
Austin, TX 78701
myates@sunedison.com

Mike Ostermiller
Kyler, Kohler, Ostermiller & Sorenson
1833 W. Royal Hunte Drive, Suite 200
Cedar City, UT 84720
mike@nwaor.org

Chris Kyler
Kyler, Kohler, Ostermiller & Sorenson
PO Box 599
Salt Lake City, UT 84110
chris@kkoslawyers.com

Jerold G. Oldroyd
Tesia N. Stanley
BALLARD SPAHR LLP
One Utah Center, Suite 600
201 South Main Street
Salt Lake City, Utah 84111-2221
oldroydj@ballardspahr.com
stanleyt@ballardspahr.com

/s/ Colette V. Dubois