

Ellis-Hall Consultants, LLC
P.O. Box 572098
Murray, Utah 84107-6764
Telephone: 801-281-1414
mail@ehc-usa.com

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION)	Docket No. 12-035-115
OF ROCKY MOUNTAIN POWER FOR)	
APPROVAL OF POWER PURCHASE)	
AGREEMENT BETWEEN PACIFICORP)	PETITION FOR INTERVENTION FILED
AND BLUE MOUNTAIN POWER)	BY ELLIS-HALL CONSULTANTS, LLC
PARTNERS, LLC)	
)	
)	

Pursuant to Utah Code Annotated § 63G-4-207 and Utah Administrative Code § R746-100-7, Ellis-Hall Consultants, LLC (“EHC”) respectfully requests that the Public Service Commission of Utah (“PSC”) permit EHC to intervene in the above referenced matter. Utah Administrative Code § R746-100-7 provides that persons wishing to intervene may do so if they conform to Utah Code Annotated § 63G-4-207.

EHC requests leave to intervene to give the PSC notice of its ownership of certain leases that are within the geographic footprint of the project commonly referred to as the Blue Mountain Wind Project (“Project”) and its concerns relating to the Project and the manner in which the Power Purchase Agreement (“PPA”) was approved and submitted under this docket. EHC believes that its interest in these leases and the subject land will be substantially affected by the current proceeding. EHC is also concerned about a conflict of interest with Blue Mountain Power Partner’s current counsel.

Consequently, EHC respectfully requests that the PSC take notice of EHC interests and permit EHC to intervene to protect its interests. EHC also requests that it be permitted to participate in any hearings or proceedings scheduled in this matter. The interests of justice and the orderly conduct of this proceeding will not be materially impaired by allowing EHC to intervene.

Notices and filings in this proceeding should be sent to the following:

Ellis-Hall Consultants, LLC
P.O. Box 572098
Murray, Utah 84157-2098
Attn: Ms. Kimberly Ceruti

Respectfully submitted this 19th day of July, 2013.

Ellis-Hall Consultants, LLC

By: /s/ Kimberly Ceruti

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July 2013, a true and correct copy of the forgoing was sent via e-mail to the following:

Paul H. Proctor
Patricia E. Schmid
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov
pschmid@utah.gov

Justin Jetter
Dennis Miller
Chris Parker
William Artie Powell
Division of Public Utilities
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
jjetter@utah.gov
dennismiller@utah.gov
chrisparker@utah.gov
wpowell@utah.gov

Gary A. Dodge, Esq.
Michael D. Cutbirth
Blue Mountain Power Partners, LLC
gdodge@hjdllaw.com
mcutbirth@champlinwind.com

Michele Beck
Brian Farr
Cheryl Murray
Office of Consumer Services
200 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mbeck@utah.gov
bfarr@utah.gov
cmurray@utah.gov

Mark C. Moench
Yvonne R. Hogle
Daniel E. Solander
David L. Taylor
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
mark.moench@pacificorp.com
yvonne.hogle@pacificorp.com
daniel.solander@pacificorp.com
dave.taylor@pacificorp.com

By: /s/ Kimberly Ceruti _____