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Attorneys for Utah Red Hills Renewable Park, LLC

Submitted January 10, 2014

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Power Purchase Agreement Between PacifiCorp and Utah Red Hills Renewable Park, LLC)	
)	
)	Docket No. 13-035-197
)	PETITION TO INTERVENE OF UTAH RED HILLS RENEWABLE PARK, LLC
)	
)	

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Utah Red Hills Renewable Park, LLC (“Petitioner”) respectfully petitions the Public Service Commission of Utah (“Commission”) for leave to intervene in the above-captioned docket .

In support of this Petition to Intervene, Petitioner represents and states as follows:

1. Petitioner is the Developer of the Utah Red Hills Renewable Solar Project and the Seller under the Power Purchase Agreement filed for approval in this docket.
2. The legal rights and interests of Petitioner will be substantially affected by this proceeding.

3. Petitioner seeks to intervene in support of Rocky Mountain Power's Application for Approval of the Power Purchase Agreement, and for the purpose of protecting its interests as they may appear.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

5. Notices in this proceeding should be sent to the following:

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

RESPECTFULLY SUBMITTED this 10th day of January 2014.

Ballard Spahr LLP

/s/ Jerold G. Oldroyd
Jerold G. Oldroyd, Esq.
Theresa A. Foxley, Esq.
BALLARD SPAHR LLP
Attorneys for Scatec Utah Red Hills Renewable
Park, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January, 2014, an original and five (5) true and correct copies of the foregoing **PETITION TO INTERVENE OF UTAH RED HILLS RENEWABLE PARK, LLC** 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:

Rocky Mountain Power:

Data Request Response Center	datarequest@pacificorp.com
Daniel. E. Solander	daniel.solander@pacificom.com
David L. Taylor	dave.taylor@pacificorp.com

Division of Public Utilities:

Patricia Schmid	pschmid@utah.gov
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Office of Consumer Services:

Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov
Brent Coleman	brentcoleman@utah.gov

/s/ Jerold G. Oldroyd