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STATE OF UTAH

Public Service Commission

In the Matter of the Investigation of the Costs
and Benefits of PacifiCorp's Net Metering
Program

Docket No. 14-035-114

**SIERRA CLUB
PETITION TO INTERVENE**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Sierra Club hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Sierra Club petitions to intervene in this proceeding on behalf of itself and its approximately 4,000 members who live and purchase utility services in Utah, many of whom are residential customers of PacifiCorp.

2. The interests of Sierra Club and its members will not be adequately represented by any other party to this proceeding.
3. The legal rights and interests of Sierra Club and its members may be substantially affected by this proceeding.
4. The Commission opened this docket to investigate the costs and benefits of PacifiCorp's net metering program, following the Commission's recent decision, in Docket No. 13-035-184, not to approve a net metering facilities charge proposed by PacifiCorp. Net metering, and distributed generation more broadly, is a matter of significant concern to Sierra Club's members. We seek to intervene in order to protect our members' interests in distributed generation and utility resource planning by advocating for fair and thorough analysis of the numerous benefits provided by distributed generation, including decreased system costs, increased system reliability and flexibility, and environmental benefits. While Sierra Club has not fully determined the specific positions it will take in this matter, we intend to make recommendations on the analytical framework for the cost-benefit analysis and explore other issues that may arise in this proceeding.
5. Sierra Club participated fully as an intervenor in the recently concluded PacifiCorp rate case, in which the Commission evaluated the net metering issue, and has been an active and productive participant in the instant docket.
6. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Sierra Club to intervene.

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

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8. Casey Roberts is an attorney in good standing and licensed to practice law in California (CA Bar No. 253474). Ms. Roberts is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-100-

6(b).

9. Travis Ritchie is an attorney in good standing and licensed to practice law in California (CA Bar No. 258084). Mr. Ritchie is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-100-

6(b).

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

DATED this 2nd day of April, 2015.

Respectfully submitted,

Original Signed by:

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