Jennifer Gardner (#15503)
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Attorney for Western Resource Advocates

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE INVESTIGATION OF THE COSTS AND BENEFITS OF PACIFICORP'S NET METERING PROGRAM	**Docket No. 14-035-114** **PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public

Service Commission ("Commission") and the Commission's November 18, 2016 Scheduling

Order and Notices of Hearing and Public Witness Hearing ("Scheduling Order"), Western

Resource Advocates ("WRA") hereby petitions for leave to intervene in the above-captioned

docket and, in support thereof, states as follows:

1.   WRA is a non-profit conservation organization dedicated to protecting the land,

air and water of the West. WRA's Clean Energy Program develops and implements policies to

reduce the environmental impacts of the electric power industry in the Interior West by

advocating for a western electric system that provides affordable and reliable energy, reduces

economic risks, and protects the environment through the expanded use of energy efficiency,

renewable energy resources, and other clean energy technologies. WRA has a Utah office, Utah

representation on its board of directors, and supporters and donors who live in Utah and are

PacifiCorp/Rocky Mountain Power ratepayers. WRA has participated in electric utility

proceedings for over 20 years and has been granted intervenor status in multiple Utah

Commission dockets.

2.   WRA has a substantial interest in the above-captioned proceeding. On November

9, 2016, Rocky Mountain Power ("the Company") made its Compliance Filing and Request to

Complete All Analyses Required Under the Net Metering Statute for the Evaluation of the Net

Metering Program ("Compliance Filing"). In the Compliance Filing, the Company argues that

the costs of net metering ("NEM") exceed the benefits and requests relief in the form of a new

rate structure for future NEM customers. Simultaneously, the Company also requested

Commission approval for a transitional tariff to place future NEM customers on notice of

possible changes to their NEM rates in Docket No. 16-035-T14. WRA's interest is directly

related to the Company's net metering proposal included in its Compliance Filing (in the above-

captioned proceeding) *and* in its request for a transitional tariff (in Docket No. 16-035-T14).

WRA timely filed comments in Docket No. 16-035-T14 on November 22, 2016. To enable

WRA to effectively analyze and assess the Company's NEM proposal in full, and to provide

intervenor expertise and input, WRA requests that its intervention be granted in the above-

captioned proceeding and further, that it be given party status in this proceeding.

3.   Intervention by WRA will not unduly broaden the issues or delay the proceeding.

WRA's petition for leave to intervene is timely filed, pursuant to the Scheduling Order. WRA

does not currently know what evidence or argument, if any, it would present in this proceeding.

4.   WRA requests that all pleadings, correspondence, discovery and other documents

be served on the following:

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>
> Nancy Kelly
> Western Resource Advocates
> 9463 N. Swallow Rd.
> Pocatello, ID 83201
> 208-234-0636
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5.   WRA also requests that the following name be added to the electronic service list

for this docket: Penny Anderson (penny.anderson@westernresources.org).

WHEREFORE, WRA respectfully requests that the Commission grant its petition for

leave to intervene in this proceeding.

Dated this 6th day of December 2016.

> Respectfully submitted,
>
> WESTERN RESOURCE ADVOCATES
>
> _____
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