Noah Hoagland (#11400) SUITTER AXLAND, PLLC 8 East Broadway, Suite 200 Salt Lake City, UT 84111 Tel: (801) 532-7300 Fax: (801) 532-7355 nhoagland@sautah.com

Peter Richardson RICHARDSON ADAMS, PLLC 515 N. 27th Street Boise, Idaho 83702 Tel: (208) 938-7901 Fax: (208) 938-7901 peter@richardsonadams.com

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Review of Electric Service Schedule No. 38, Qualifying Facilities Procedures, and Other Related Procedural Issues	DOCKET NO. 14-035-140 Ecoplexus, Inc., Inc. Petition to Intervene
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7,

Ecoplexus, Inc., Inc. respectfully petitions the Public Service Commission of Utah

("Commission") for leave to intervene in this docket regarding the review of Electric Service

Schedule No. 38, Qualifying Facilities Procedures, and other related procedural issues. In

support of this petition, Ecoplexus, Inc. states as follows:

1. Ecoplexus, Inc. develops commercial and utility scale solar projects. Ecoplexus, Inc.

is a leader in the development, design, engineering, construction, and financing of solar energy

systems for the non-profit, commercial, municipal, and utility markets. The company provides a

full set of professional services covering the entire process for a solar energy facility. It is currently in the process of developing solar PURPA projects in Utah.

2. As a developer of PURPA solar projects in Utah, Ecoplexus, Inc.'s legal rights and interests may be substantially affected by this proceeding.

3. Ecoplexus, Inc. has not fully determined specific positions it will take or the relief it will seek. Ecoplexus, Inc. seeks to intervene for purposes of protecting its interests as they arise.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Ecoplexus, Inc. to intervene. Intervention by Ecoplexus, Inc. will not unduly broaden the issues, delay the proceeding, or materially impair the orderly conduct of the proceeding.

5. Ecoplexus, Inc.'s interests are not adequately represented by another party in this proceeding.

6. If Ecoplexus, Inc. is granted leave to intervene in this proceeding, notices should be sent to Mr. Richardson and Mr. Hoagland as noted above and the following:

John Gorman Erik Stuebe ECOPLEXUS, INC. 650 Townsend, Ste. 310 San Francisco, CA 415-626-1802 johng@Ecoplexus, Inc..com eriks@Ecoplexus, Inc..com

Dr. Don Reading Ben John & Associates 6070 Hill Road Boise, Idaho 83703 <u>dreading@mindspring.com</u>

Petition to Intervene by Ecoplexus, Inc. Docket No. 14-035-140 2 WHEREFORE, Ecoplexus, Inc. requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 17th day of March, 2015.

Ecoplexus, Inc.

<u>/s/ Noah M. Hoagland</u> Noah Hoagland Attorney for Ecoplexus, Inc.

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CERTIFICATE OF SERVICE Docket No. 14-035-140

I hereby certify that on the 17th day of March, 2015, the original of the foregoing PETITION TO INTERVENE OF ECOPLEXUS, INC. was served hand delivery 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

and by email to psc@utah.gov and the following parties:

ROCKY MOUNTAIN POWER:

Yvonne Hogle	yvonne.hogle@pacificorp.com
Bob Lively	bob.lively@pacificorp.com
Daniel Solander	daniel.solander@pacificorp.com

DIVISION OF PUBLIC UTILITIES:

Patricia Schmid	pschmid@utah.gov
Justin Jetter	jjetter@utah.gov
Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Dennis Miller	dennismiller@utah.gov

OFFICE OF CONSUMER SERVICES:

Rex Olsen	rolsen@utah.gov
Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov
Bela Vastag	bvastag@utah.gov

ENERGY OF UTAH

Ros Rocco Vrba	rosvrba@energyofutah.onmicrosoft.com
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SUNEDISON

Gary Dodge	gdodge@hjdlaw.com
Daniel Patry	dpatry@sunedison.com

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SCATEC SOLAR Jerold Oldroyd oldroydj@ballardspahr.com Sharon Bertelsen bertelsens@ballardspahr.com Luigi Resta luigi.resta@scatecsolar.us

UTAH OFFICE OF ENERGY DEVELOPMENT

Jeffrey Barrett jhbarrett@utah.gov

UTAH CLEAN ENERGY

Sophie Hayes	sophie@utahcleanenergy.org
Kate Brown	kate@utahcleanenergy.org

WIND SONG

J. Craig Smith	
Adam Long	

jsmith@smithlawonline.com	
along@smithlawonline.com	

/s/ Noah M. Hoagland