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BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s 2015 Integrated Resource Plan)
Docket No. 15-035-04)
)

**PETITION TO INTERVENE AND MOTION
OF FOREIGN ATTORNEY TO REPRESENT PARTY**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), the Interwest Energy Alliance (“Interwest”) hereby files:
a) its petition to intervene pursuant to Utah Public Service Commission Rule R746-100-6 (B) and R746-100-7; and b) its motion for undersigned counsel to represent Interwest in this proceeding pursuant to Utah Administrative Procedures Act Sec. 63G-4-207 (1) and, in support thereof, states as follows:

I. PETITION TO INTERVENE

A. Interwest Energy Alliance is a 501(c)(6) nonprofit trade association of renewable energy project developers and equipment manufacturers working with the non-governmental conservation community to promote renewable energy in Utah, Colorado, Wyoming, Nevada, Arizona and New Mexico. Interwest has been actively engaged in public input processes and regulatory dockets in Wyoming and Utah related to Rocky Mountain Power’s resource planning

and other proceedings to promote additional acquisitions of renewable energy. Interwest's members will be substantially affected by the proceedings and results of this docket, because they bid into requests for proposals which may be issued by PacifiCorp to implement the resource plan which will be considered and potentially acknowledged herein. Interwest members will offer low-cost, stable-priced, power without fuel costs from their renewable energy projects to serve Utah ratepayers, and the relative choices between and among generation and transmission alternatives incorporated into the 2015 IRP will affect the prices paid by Utah ratepayers for years to come.

B. Interwest's board members include environmental organizations working in Utah and in other states served by Rocky Mountain power to promote renewable energy market development. All of these member companies and organizations promote regulatory best practices which will incentivize growth in the renewable energy markets, which can be applied in this proceeding.

C. No other party to the proceeding will advocate for or represent the interest of Interwest's independent power producer members. Interwest does not currently know what evidence, if any, it would present in this proceeding. Therefore, Interwest requests that its intervention be granted and it be given party status in this proceeding.

D. Interwest's petition for leave to intervene is timely filed. Interwest's participation will not affect or impede the just, orderly and prompt conduct of these proceedings.

II. MOTION FOR PERMISSION TO BE REPRESENTED BY OUT-OF-STATE ATTORNEY

A. Pursuant to Rule R746-100-6(B) of the Rules of Practice and Procedure of the Utah Public Service Commission, Interwest moves the Commission to allow the undersigned attorney,

licensed in Colorado and Wyoming, be allowed to represent it in this proceeding without associated Utah counsel.

B. Hiring local representation by an attorney licensed in Utah would pose an unreasonable hardship and financial burden upon Interwest. Interwest has already engaged the undersigned on a regular basis to participate in regulatory proceedings, and it would be a costly burden on its limited resources to engage local counsel who would have to be retained in addition to the undersigned.

C. The undersigned represents Interwest on a regular basis related to multi-state activities, and has previously represented Interwest in Utah regulatory dockets, including Docket No. 13-2035-01 and Docket No. 11-2035-01. Interwest regularly collaborates with other regulatory counsel in Utah. The purpose and scope of intervention is to file comments and/or expert testimony and to obtain discovery. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court October 16, 2003.

THEREFORE, Interwest respectfully requests that the Commission grant its petition for leave to intervene in this proceeding, for it to be granted party status and for the undersigned to be allowed to act as counsel to represent Interwest as a party to this action. Further, if the foregoing is approved, Interwest requests that all pleadings, correspondence, discovery and other documents be served on the undersigned counsel for Interwest.

Respectfully submitted this 23rd day of March, 2015.

/s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey, Colo. Reg. #15046

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On Behalf of Interwest Energy Alliance

Interwest Energy Alliance

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 23rd day of March, 2015, on the following:

By Electronic-Mail:

psc@utah.gov

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