

Sophie Hayes (12546)
Meghan Dutton (14440)
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84103
801-363-4046
sophie@utahcleanenergy.org
meghan@utahcleanenergy.org
Counsel for Utah Clean Energy

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>THE APPLICATION OF ROCKY MOUNTAIN POWER FOR MODIFICATION OF CONTRACT TERM OF PURPA POWER PURCHASE AGREEMENTS WITH QUALIFYING FACILITIES</p>	<p>Docket No. 15-035-53</p> <p>UTAH CLEAN ENERGY PETITION TO INTERVENE</p>
---	--

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Utah Clean Energy respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket regarding the proposed modification of contract terms of PURPA power purchase agreements. In support of this petition, Utah Clean Energy states as follows:

1. Utah Clean Energy is a state-based, non-profit, public interest organization working to create healthy, thriving communities empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on preventing wasted energy, facilitating clean energy, and creating a smart energy future.

2. As an advocate for renewable energy, energy efficiency, conservation and a

sustainable energy future, Utah Clean Energy's legal rights and interests may be substantially affected by this proceeding.

3. Utah Clean Energy has not fully determined specific positions it will take or the relief it will seek. Utah Clean Energy 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 Utah Clean Energy to intervene.

5. Utah Clean Energy's interests are not adequately represented by another party in this proceeding.

6. If Utah Clean Energy is granted leave to intervene in this proceeding, notices should be sent to the following:

Sophie Hayes
Kate Bowman
UTAH CLEAN ENERGY
1014 2nd Avenue
Salt Lake City, UT 84103
801-363-4046
sophie@utahcleanenergy.org
kate@utahcleanenergy.org

WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 1st day of June, 2015.

RESPECTFULLY SUBMITTED,
Utah Clean Energy

/s/ _____
Sophie Hayes
Meghan Dutton
Attorneys for Utah Clean Energy

CERTIFICATE OF SERVICE
Docket No. 15-035-53

I hereby certify that a true and correct copy of the foregoing was served by email this 1st day of June, 2015 on the following:

ROCKY MOUNTAIN POWER:

Yvonne Hogle	yvonne.hogle@pacificorp.com
Bob Lively	bob.lively@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

SUNEDISON

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

SCATEC SOLAR

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

WIND SONG, INC.

J. Craig Smith	jcsmith@smithlawonline.com
Adam S. Long	along@smithlawonline.com

ECOPLEXUS, INC.

Noah Hoagland	nhoagland@sautah.com
Peter Richardson	peter@richardsonadams.com
John Gorman	johng@ecoplexus.com
Erik Stuebe	eriks@ecoplexus.com
Dr. Don Reading	dreading@mindspring.com

ELLIS-HALL CONSULTANTS, LLC

Tony Hall	mail@ehc-usa.com
-----------	------------------

/s/ Sophie Hayes