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STATE OF UTAH

Public Service Commission

In the Matter of the Application of Rocky
Mountain Power for Modification of
Contract Term of PURPA Power Purchase
Agreements with Qualifying Facilities

Docket No. 15-035-53

**SIERRA CLUB
PETITION TO INTERVENE**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner 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 3,800 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power (“RMP” or the “Company”).
2. The interests of each of the Sierra Club and its members will not be adequately represented by any other party to this proceeding. To the extent the interests of the Sierra Club overlap with any other party, Sierra Club will coordinate with that party to avoid duplicative efforts.

3. The legal rights and interests of Sierra Club and its members may be substantially affected by this proceeding.

4. Sierra Club has not fully determined the specific positions it will take or the relief it will seek. Sierra Club seeks to intervene for purposes of protecting its interests and the interests of its members as they may appear, particularly on issues of relevance to the public health, environmental, and economic impacts of the Company's proposed actions. Based on an initial review of the application, Sierra Club is concerned that the requested modification to the contract terms for PURPA power purchase agreements may substantially impair the development of clean renewable energy resources to the detriment of ratepayers and the environment. Sierra Club intends to explore this issue and others that may arise in the proceeding.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Sierra Club to intervene.

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

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7. Gloria Smith (CA Bar No. 200824) and Travis Ritchie (CA Bar No. 258084) are both attorneys in good standing and licensed to practice law in California. Ms. Smith and Mr. Ritchie are both full-time employees of Sierra Club and are therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-100-6(b).

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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 9th day of June, 2015.

Respectfully submitted,

Original Signed By:

Travis Ritchie
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