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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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 PETITION TO INTERVENE OF SUSTAINABLE POWER GROUP
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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Sustainable Power Group (“Petitioner”) hereby submits its Petition to Intervene in Docket No. 15-035-53. In support of this petition, Petitioner states as follows:

1. Petitioner is an independent power producer headquartered in Salt Lake City, Utah. Petitioner owns and operates over 150 sustainable energy projects located in Utah and North America.
2. As an owner and developer of renewable energy projects, including Qualified Facilities in Utah, Petitioner’s legal rights and interests will be substantially affected by this proceeding and will not be adequately represented by any other party.
3. Petitioner opposes Rocky Mountain Power’s Application to reduce the maximum term of Qualifying Facility contracts to three years. Petitioner seeks to intervene for the purpose of protecting its interests as they may appear.

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

5. Notices and filings in this proceeding should be sent to the following:

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 16th day of September 2015.

SNELL & WILMER L.L.P.

/s/ Brad Merrill

CERTIFICATE OF SERVICE

Docket No. 15-035-53

I CERTIFY that on the 16th day of September, 2015, a true and correct copy of the foregoing was served upon the following as indicated below:

HAND DELIVERY:

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/s/ Brad Merrill _____