

Tyler Poulson  
Salt Lake City Corporation  
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**Before the Public Service Commission of Utah**

In the Matter of the Application of Rocky Mountain Power for Approval of its Subscriber Solar Program (Schedule 73)

**Docket No. 15-035-61**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Salt Lake City Corporation (“City”) respectfully requests that the Commission grant its Petition to Intervene in Docket No. 15-035-61. In support of this petition, Petitioner states as follows:

1. Petitioner is a local government in Utah serving the interests of a large number of citizens who are customers of Rocky Mountain Power d/b/a PacifiCorp (“RMP”). Petitioner has established community-level and municipal renewable energy and pollution reduction goals that may be impacted by the outcomes of this docket.

2. Petitioner is a customer of RMP that consumes a large amount of electricity across many sites representing hundreds of electric meters. Petitioner has existing renewable energy systems at its facilities and an interest in pursuing new renewable energy opportunities. Outcomes of this docket may impact these interests.

3. The legal rights and interests of Petitioner may be substantially affected by this proceeding.

4. Petitioner has participated in this docket since its inception, including attending the first technical conference on July 10, 2015.

5. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for purposes of protecting its interests as they may appear.

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

7. Petitioner's interests are not adequately represented by another party in this proceeding.

8. Copies of all notices, orders or pleadings in this proceeding should be served on:

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

DATED this 23rd day of July, 2015.

Salt Lake City Corporation

/s/ Tyler Poulson

**Certificate of Service**  
**Docket No. 15-035-61**

I hereby certify that on this 23<sup>rd</sup> day of July, 2015 a true and correct copy of the above and foregoing PETITION TO INTERVENE OF SALT LAKE CITY CORPORATION was served by email to the following:

Rocky Mountain Power:

Yvonne Hogle	yvonne.hogle@pacificorp.com
Bob Lively	bob.lively@pacificorp.com
Paul Clements	paul.clements@pacificorp.com

Division of Public Utilities:

Patricia Schmid	pschmid@utah.gov
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Office of Consumer Services:

Rex Olsen	rolsen@utah.gov
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Utah Clean Energy:

Sophie Hayes	sophie@utahcleanenergy.org
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/s/ Tyler Poulson