

Brian W. Burnett (3772)
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
801-530-7428
brianburnett@cnmlaw.com

Counsel for Renewable Energy Coalition

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>THE APPLICATION OF ROCKY MOUNTAIN POWER'S PROPOSED REVISIONS TO ELECTRIC SERVICE SCHEDULE NO. 37, AVOIDED COST PURCHASES FROM QUALIFYING FACILITIES</p>	<p>Docket No. 15-035-T06</p> <p>PETITION TO INTERVENE</p>
---	---

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Renewable Energy Coalition respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket regarding proposed revisions to Schedule 37 prices and pricing method. In support of this petition, Renewable Energy Coalition states as follows:

1. Renewable Energy Coalition was established in 2009, and is comprised of over thirty members who own and operate nearly forty non-intermittent Qualifying Facilities (“QFs”) in Oregon, Idaho, Washington, Utah, and Wyoming. Renewable Energy Coalition’s members have power purchase agreements with Northwest and Rocky Mountain electric utilities, including PacifiCorp.

Renewable Energy Coalition's members include government entities and municipal corporations, including Wasatch Integrated Waste Management District, and Draper Irrigation District which are located in Utah. Other individual member(s) own and operate small QFs in Utah as well. As irrigation and waste management districts, the power sales for these facilities are reinvested into the community. Therefore, sales from these QFs provide significant benefits to the local economy. Individual member owned small hydro project(s) also provide local economic benefits.

2. Renewable Energy Coalition's legal rights and interests may be substantially affected by this proceeding because Rocky Mountain Power's proposal regarding capacity payments in Schedule 37 significantly undercompensates QFs for the capacity value they provide to the company and the rate payers.

3. Renewable Energy Coalition will file Comments in this proceeding setting forth specific positions it will take and the relief it will seek. Renewable Energy Coalition 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 Renewable Energy Coalition to intervene.

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

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

Brian W. Burnett
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
brianburnett@cnmlaw.com

Renewable Energy Coalition
Attn: John Lowe
12050 SW Tremont Street
Portland, OR 97225
jravenesanmarcos@yahoo.com

Irion Sanger
Sanger Law, P.C.
1117 SE 53rd Avenue
Portland, OR 97215
irion@sanger-law.com

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

DATED this 16th day of July, 2015.

Respectfully submitted,

RENEWABLE ENERGY COALITION

/s/ Brian W. Burnett

Counsel for Renewable Energy Coalition

CERTIFICATE OF SERVICE
Docket No. 15-035-T06

I hereby certify that a true and correct copy of the foregoing was served by email this 16th day of July, 2015 on the following:

ROCKY MOUNTAIN POWER:

Data Request Response Center (datarequest@pacificorp.com)
Yvonne Hogle yvonne.hogle@pacificorp.com
Daniel Solander daniel.solander@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

UTAH CLEAN ENERGY

Sophie Hayes sophie@utahcleanenergy.org
Meghan Dutton meghan@utahcleanenergy.org

RENEWABLE ENERGY COALITION

Brian Burnett brianburnett@cnmlaw.com
Irion Sanger irion@sanger-law.com
John Lowe jravenesanmarcos@yahoo.com

/s/ Brian W. Burnett
