

Ellis-Hall Consultants, LLC
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In The Matter Of: The Application Of)	<i>Docket No. 16-035-27</i>
Rocky Mountain Power For Approval Of)	ELLIS-HALL’S REPLY TO
A Renewable Energy Services Contract)	OPPOSITION TO PETITION TO
Between Rocky Mountain Power And)	INTERVENE FILED BY ELLIS-
Facebook, Inc. Pursuant To Tariff)	HALL CONSULTANTS, LLC
Electric Service Schedule 34)	

Ellis-Hall Consultants, LLC (“Ellis-Hall”) hereby replies to Rocky Mountain Power (“RMP’s”) objection to Ellis-Hall’s intervention. RMP contends that Ellis-Hall cannot demonstrate that (1) its legal rights or interests may be substantially affected in this docket and (2) that the interest of justice and orderly and prompt conduct of the proceeding will not be material impaired. Obj. 2. Ellis-Hall will address each argument in turn.

First, RMP concedes that Ellis-Hall’s legal rights and interests will be substantially affected. In RMP’s application, Mr. Clements is described to have confidentially testified about “the renewable resource application process including how the resources will be identified” that will serve Facebook. App. 5. RMP admits that this may substantially affect Ellis-Hall, stating that “Ellis-Hall could conceivably become a supplier of renewable energy to Facebook, Inc. through the terms established in the contract for the procurement of customer renewable resources.” Obj. 2. Ellis-Hall, therefore, has a legitimate and substantial interest in a transparent

“renewable resource application process” and to ensure that RMP is acting in a fair, nondiscriminatory manner in obtaining those resources.

Second, RMP contends that allowing Ellis-Hall’s intervention could impair the promptness of this proceeding. RMP conjectures that Ellis-Hall’s intervention “may be viewed” as an attempt to gain a commercial advantage by serving discovery, file motions, objections, and interfering with any settlement between the other parties. Obj. 3. RMP’s fears are misplaced and premature. Ellis-Hall does not, and will not seek to delay the proceedings and does not object to the expedited nature of these proceedings. In fact, Ellis-Hall applauds Facebook’s dedication to renewable energy. In the event that Ellis-Hall serves discovery to which RMP may disagree, RMP may bring that grievance to the Commission. Summarily barring intervenors when other procedures exist to mitigate RMP’s concerns is not appropriate.

For these reasons, the Commission should grant Ellis-Hall’s intervention.

RESPECTFULLY SUBMITTED this 1st day of August, 2016.

Ellis-Hall Consultants, LLC

By: /s/ Anthony Hall

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of August, 2016 a true and correct copy of ELLIS-HALL'S REPLY TO OPPOSITION TO PETITION TO INTERVENE FILED BY ELLIS-HALL CONSULTANTS, LLC in the above referenced docket was sent via e-mail to the following:

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By: /s/Ron Weathers