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Attorney for Salt Lake City Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF ROCKY MOUNTAIN
POWER'S SUSTAINABLE
TRANSPORTATION AND ENERGY PLAN
("STEP") ACT INITIATIVES

**SALT LAKE CITY CORPORATION'S
PETITION TO INTERVENE**

Docket No. 16-035-36

Pursuant to Utah Code Ann. § 63G-4-207(1) and Utah Admin. Code R746-100-7, Salt Lake City Corporation ("Petitioner") hereby petitions for leave to intervene in Phase II of this docket.

Rule R746-100-7 provides intervention "for any purpose, including opposition to proposed agency action or a request for agency action filed by a party to a proceeding," so long as the petition for intervention is made "in conformance with Section 63G-4-207." Utah Admin. Code R746-100-7. Section 63G-4-207(2) permits intervention when "(a) the petitioner's legal interests may be substantially affected by the formal adjudicative proceeding; and (b) the interests of justice and the orderly and prompt conduct of the adjudicative proceedings will not be materially impaired by allowing the intervention." Utah Code Ann. § 63G-4-207(2). In support of this petition, Petitioner states as follows:

1. Petitioner, a local governmental entity, is a customer of Rocky Mountain Power

(“RMP”) that currently owns and operates a number of electric vehicle (EV) charging stations both for internal fleet use and use by the general public. Petitioner intends on investing in more electric vehicle charging infrastructure over time and outcomes in Phase II of this docket, in particular the proposed Plug-in Electric Vehicle Incentive Pilot Program, will impact these interests.

2. Petitioner has established community-level energy and pollution reduction goals reliant on the sustained adoption of electrified transportation and associated infrastructure, and the Petitioner’s ability to achieve these goals will be impacted by the outcomes of this docket.

3. Thus, the legal rights and interests of Petitioner may be substantially affected by this proceeding.

4. 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.

5. Petitioner’s request, filed prior to the deadline set forth in the Phase II Scheduling Order in this matter, is timely. Thus the interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

6. Petitioner’s interests are not adequately represented by another party in this proceeding.

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

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

DATED this 30th day of January, 2017.

Salt Lake City Corporation

/s/ Megan J. DePaulis
Attorney for Salt Lake City Corporation