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**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the PacifiCorp's)
Revisions to Schedule 135, Net Metering)
Service and Proposal for New Schedule)
135A, Net Metering-Transition Service)

Docket No. 16-035-T14

**PETITION TO INTERVENE OF SUNRUN AND ENERGY FREEDOM
COALITION OF AMERICA**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7,
Sunrun and Energy Freedom Coalition of America hereby jointly petition for leave to intervene
in the above-captioned proceeding before the Public Service Commission of Utah
("Commission"). In support of this Petition, Sunrun and EFCA state as follows:

1. On November 9, 2016, Rocky Mountain Power ("Company") submitted a
"Compliance Filing" in Docket No. 14-035-114 proposing specific rate structure changes to its
currently effective net metering tariffs and submitted Advice No. 16-13 in the above-captioned
docket. Advice No. 16-13 proposes to close Schedule 135 and open new, transitional Schedule
135-A for net metering customers that apply after December 9, 2016. The implication of this
Advice filing, in the context of the Compliance Filing, is that customers applying for net
metering service after December 9, 2016 will have different rights than customers applying on or

before December 9th, as the Company proposes that the latter group of customers will remain on legacy net metering rate schedules for some currently unspecified amount of time.

2. The Energy Freedom Coalition of America (“EFCA”) is a national association of companies that include SolarCity Corporation, Silevo, LLC, Zep Solar, LLC, Go Solar, LLC, 1 Sun Solar Electric, LLC, and Ecological Energy Systems. EFCA member companies manufacture, distribute, develop, and provide rooftop solar PV and other distributed energy equipment, systems, and services to millions of homeowners, businesses, schools, non-profits, and public sector customers in numerous states, including Utah. EFCA member SolarCity is a full-service rooftop solar PV provider and has a regional headquarters in the Salt Lake City area. EFCA participates in utility commission proceedings around the country and advocates on behalf of its members and their customers on net metering and other issues to protect consumer choice and make solar energy available to all Americans.

3. Sunrun is the nation’s largest dedicated residential rooftop solar company. The Company designs, installs, monitors and maintains solar panels on homeowner rooftops. Sunrun is committed to ensuring that all utility customers have a viable choice in how they consume electricity. Sunrun has an interest in ensuring that rooftop solar is deployed efficiently and economically and that utility rate design is fair, clear, and transparent so as not to discriminate against any particular class of customers or customers who install rooftop solar.

4. This proceeding directly impacts the interests of Sunrun and EFCA. Both entities have member companies, subsidiaries, or business partners located or operating in Utah involved in providing solar services to the Company’s ratepayers. Any change to the net metering tariff directly impacts these current and prospective customer relationships and undermines the

ongoing regulatory efforts of both Sunrun and EFCA to increase or protect access to policies that support customer adoption of onsite solar generation facilities. The Advice filing creates significant uncertainty that threatens immediate harm to the Utah solar industry and to the interest of EFCA and Sunrun.

5. No other party will adequately represent the interest of Sunrun and EFCA in the outcome of these proceedings. Sunrun and EFCA's participation will not broaden the scope of issues or delay the conduct of this proceeding and will promote the public's interest in ensuring that access to customer-sited solar generation facilities remains viable and protected by the substantive and procedural safeguards embodied in Utah law.

6. Sunrun and EFCA are filing for dismissal or, in the alternative, suspension of Advice No. 16-13 and seek party status to enjoy all other rights afforded to a party under Utah law and the Commission's Rules of Practice and Procedures.

7. Pursuant to Utah Admin. Code § R746-100-6(B), Sunrun and EFCA have consented to be jointly represented in this proceeding by its attorney, Bruce Plenk, who should receive all communications regarding this matter and be listed on the service list as follows:

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8. Sunrun and EFCA request that the following persons be added to the service list for email service only:

- Thad Culley, Keyes & Fox, LLP, tculley@kfvlaw.com
- James M. Van Nostrand, Keyes & Fox, LLP, jvannostrand@kfvlaw.com
- Becca Polisuk, Sunrun, becca.polisuk@sunrunhome.com

- Gracie Walovich, Sunrun, gracie.walovich@sunrunhome.com
- Kevin Auererbacher, SolarCity, kauerbacher@solarcity.com

For these reasons, Sunrun and EFCA respectfully requests that the Commission grant its Petition to Intervene and permit Sunrun and EFCA to jointly participate in this proceeding as a party with all of the rights attached thereto.

Respectfully submitted this 22nd day of November, 2016.

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