

Amanda Smith, # 6536
Jennifer S. Horne, #13750
HOLLAND & HART LLP
222 South Main Street, Suite 2200
Salt Lake City, UT 84101
Office: (801) 799-5900
Fax: (801) 799-5700
ASmith@hollandhart.com
JSHorne@hollandhart.com

Attorneys for Utah Solar Energy Association

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's Revisions to Schedule 135A, Net Metering- Transition Service	DOCKET NO. 16-035-T14 PETITION TO INTERVENE OF UTAH SOLAR ENERGY ASSOCIATION
--	--

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Utah Solar Energy Association (the "Association") hereby petitions the Public Service Commission of Utah ("Commission") for leave to intervene in the above-entitled matter.

The grounds for this petition are as follows:

1. The Association is a Utah nonprofit corporation whose mission is to champion the growth of Utah's solar industry through policy advancement, education, advocacy and business services for industry members, as well as commercial and residential solar customers.
2. The Association's members include companies that design, build, integrate, install, and/or service rooftop solar systems, or provide other important services in the rooftop solar industry in Utah ("Members").
3. Over the past five years, Utah's solar industry has added approximately 4,000 jobs in Utah, including manufacturers, installers, electricians and system suppliers. The viability

of the solar industry in this state has added value in recruiting and maintaining key companies that contribute to economic growth.

4. The Members have a direct interest in developing solar energy systems through net metering arrangements. Net metering rates, and, critically, the predictability of net metering rates into the future, substantially impacts the continued viability of the rooftop solar industry in Utah.

5. The Association seeks to intervene in this docket because these proceedings will have a substantial negative effect on the legal rights and interests of the Association and its Members, as explained more fully in the Association's comments, filed in this docket on November 22, 2016.

6. Rooftop solar requires the customer to make a large upfront investment in solar panels and associated equipment. The customer needs a level of certainty and predictability to be able to evaluate the potential return on investment. The proposed tariff would undermine any certainty and predictability in the net metering rates Rocky Mountain Power ("RMP") would charge (or reimburse for excess power) the solar rooftop customer.

7. The proposed tariff is a significant deviation from Schedule 135. Under Schedule 135, the net metering ratepayer (rooftop solar customer) can accurately calculate the value of the investment necessary to participate in net metering because the ratepayer can enter into an agreement with Rocky Mountain Power ("RMP") in which net metering rates are locked in.

8. RMP's proposed tariff would unfairly increase costs for net metering ratepayers and decrease predictability. The proposed tariff would, among other things, effectively create a segregated body of ratepayers who have made a substantial investment but have no certainty or predictability on a return on that investment. It would allow the net metering rate to be changed through a separate process at any given time upon filing of a new tariff. RMP's proposed

changes to Schedule 135 and new Schedule 135A would therefore have an unfair chilling effect on the rooftop solar industry in Utah.

9. In addition, the Association is a party in Docket No. 14-035-114, In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program. Docket No. 14-035-114 is inextricably connected to RMP's proposals in this docket. Docket 14-035-114 is the proper forum for review and input by all of the stakeholders on the analyses presented by RMP prior to any changes being made in the underlying policy. To approve the tariff in Docket 16-035-T14 would be inconsistent with the public process now underway.

10. The relief the Association seeks in this docket is for the Commission to reject or suspend the changes RMP has proposed to Schedule 135 and the proposed new Schedule 135A at least until the Commission issues a final order on RMP's compliance filing in Docket No. 14-035-114. The Association also seeks to intervene for purposes of protecting any other interests it may have in this docket as they may appear.

11. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired if the Association is allowed to intervene. The Association will meet any scheduling requirements established by the Commission in this docket.

12. Notices and filings in this proceeding should be sent to the following:

Amanda Smith
Jennifer Horne
HOLLAND & HART, LLP
222 South Main Street, Suite 2200
Salt Lake City, UT 84101
Email: ASmith@hollandhart.com; JSHorne@hollandhart.com

WHEREFORE, the Association respectfully requests leave to intervene in this proceeding and asks that the Commission enter an Order granting the Association's petition to intervene enabling the Association to participate to the full extent allowed by law.

DATED this 29th day of November, 2016.

HOLLAND & HART LLP

/s/ Amanda Smith

Amanda Smith

Jennifer S. Horne

Attorneys for Utah Solar Energy Association

CERTIFICATE OF SERVICE

I hereby certify that I will cause a true and correct copy of the foregoing **PETITION TO INTERVENE OF UTAH SOLAR ENERGY ASSOCIATION** to be delivered to the Utah Public Service Commission on November 29, 2016 via hand delivery and to be served via email on that day on the following persons:

PacifiCorp

Data Request Response Center (datarequest@pacificorp.com)

Rocky Mountain Power

Robert C. Lively (bob.lively@pacificorp.com)

Michael S. Snow (Michael.snow@pacificorp.com)

Yvonne Hogle (yvonne.hogle@pacificorp.com)

Daniel E. Solander (daniel.solander@pacificorp.com)

Assistant Utah Attorneys General

Patricia Schmid (pschmid@utah.gov)

Justin Jetter (jjetter@utah.gov)

Rex Olsen (rolsen@utah.gov)

Robert Moore (rmoore@utah.gov)

Division of Public Utilities

Erika Tedder (etedder@utah.gov)

Vivint Solar

Stephen F. Mecham (sfmecham@gmail.com)

Walter Pera (wpera5769@yahoo.com)

Western Resource Advocates

Jennifer Gardner (jennifer.gardner@westernresources.org)

Utah Clean Energy

Sophie Hayes (sophie@utahcleanenergy.org)

University of Utah

Phillip J. Russell (prussell@hjdllaw.com)

Salt Lake City Corporation

Tyler Poulson (tyler.poulson@slcgov.com)

Utah Citizens Advocating Renewable Energy

Michael D. Rossetti (mike_rossettie@ucare.us.org)

Stanley T. Holmes (stholmes3@xmission.com)

Dr. Robert G. Nohavec (nohavec@xmission.com)

/s/ Julie Uriona