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Utah Clean Energy
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Attorney for Utah Clean Energy

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of Rocky Mountain Power's 2019 Avoided Cost Input Changes Quarterly Compliance Filing</p>	<p>Docket No. 19-035-18 Petition for Leave to Intervene of Utah Clean Energy</p>
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-1-108, Utah Clean Energy respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket regarding Rocky Mountain Power’s 2019 avoided cost input changes quarterly compliance filing:

1. Utah Clean Energy is a state-based, non-profit, public interest organization working to create healthy, thriving communities empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on preventing wasted energy, facilitating clean energy, and creating a smart energy future.

2. Utah Clean Energy’s legal rights and interests will be substantially affected by this proceeding. The proposed avoided cost prices that Rocky Mountain Power originally proposed in its January 10, 2020 third quarter avoided cost compliance filing represent a significant departure from previous updates. The consequences of this proceeding will directly affect the economics of renewable energy projects in Utah, which directly affects Utah Clean Energy’s mission.

3. Utah Clean Energy has not fully determined specific positions it will take or the relief it will seek. Utah Clean Energy 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 Utah Clean Energy to intervene.

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

Hunter Holman
Kate Bowman
UTAH CLEAN ENERGY
1014 2nd Avenue
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801-363-4046
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kate@utahcleanenergy.org

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

DATED this 5th day of March 2020.

Respectfully submitted,

/s/ Hunter Holman

Hunter Holman
Attorney for Utah Clean Energy

CERTIFICATE OF SERVICE

Docket No. 19-035-18

I hereby certify that a true and correct copy of the foregoing was served by email this 5th day of March 2020, on the following:

ROCKY MOUNTAIN POWER

Jana Saba	jana.saba@pacificorp.com
Utah dockets	utahdockets@pacificorp.com
Data Request Response Center	datarequest@pacificorp.com

DIVISION OF PUBLIC UTILITIES

Patricia Schmid	pschmid@agutah.gov
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OFFICE OF CONSUMER SERVICES

Robert Moore	rmoore@agutah.gov
Michele Beck	mbeck@utah.gov
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/s/ Hunter Holman
