

RONALD L. RENCHER (2723)
VICKI M. BALDWIN (8532)
PARSONS BEHLE & LATIMER
One Utah Center
201 South Main Street, Suite 1800
Post Office Box 45898
Salt Lake City, UT 84145-0898
Telephone: (801) 532-1234
Facsimile: (801) 536-6111
Attorneys for Summit Power Group, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision Resulting from the All Source Request for Proposals.

Docket No. 10-035-126

**PETITION FOR LEAVE TO
INTERVENE OF SUMMIT POWER
GROUP, INC.**

In accordance with the provisions of Utah Code Ann. § 63G-4-207 and Rule R746-100-7 of the Public Service Commission's Rules of Practice and Procedure, Summit Power Group, Inc. ("Summit"), hereby petitions the Utah Public Service Commission ("Commission") for leave to intervene in the above-referenced proceeding, and requests that the Commission issue an order allowing Summit to participate fully in this matter.

In support of its Petition to Intervene, Summit states as follows:

1. Summit is in the business of developing power projects, including natural gas-fired projects, for would-be project owners on a success-fee basis. Summit was the developer of the successful Lakeside 1 power project. Summit also participated in the 2012 All Source Request for Proposals ("RFP") as a bidder on the Lakeside 2 power project, and in fact, was selected along with its engineering, procurement and construction contractor, CH2M Hill, although the project was ultimately not built. Summit then participated as a bidder when the RFP was updated and re-issued in December 2009.

2. The interests of Summit will not be adequately represented by any other party to this proceeding.

3. Summit has a direct, immediate, and substantial interest in this proceeding as a bidder in the RFP with the Lakeside 2 power project because as a bidder of the Lakeside 2 power project, its legal rights and interests will be affected by the Commission's evaluation and determination of the Lakeside 2 RFP process.

4. Summit has not yet determined the level of its participation or the precise nature of relief it will seek, but requests that the Commission grant Summit intervention as its interests may appear.

5. If Summit is granted leave to intervene in this proceeding, it hereby requests that service of all pleadings, notices, etc. be made to the following:

Ronald L. Rencher
Vicki M. Baldwin
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
rrencher@parsonsbehle.com
vbaldwin@parsonsbehle.com

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of Summit's Petition to Intervene.

7. WHEREFORE, Summit requests that the Commission enter an Order granting Summit permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 31st day of January, 2011.

/s/ Vicki M. Baldwin

Ronald L. Rencher
Vicki M. Baldwin
PARSONS BEHLE & LATIMER
Attorneys for Summit Power Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2011, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION OF THE SUMMIT POWER GROUP, INC. FOR LEAVE TO INTERVENE** to:

Patricia Schmid
Felise Thorpe Moll
Assistant Attorneys General
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov
ftorpemoll@utah.gov

Michele Beck
Executive Director
COMMITTEE OF CONSUMER
SERVICES
Heber Wells Building
160 East 300 South, 2nd Floor
SLC, UT 84111
mbeck@utah.gov

David L. Taylor
Yvonne R. Hogle
Mark C. Moench
ROCKY MOUNTAIN POWER
201 South Main Street, Suite
2300
SLC,UT 84111
Dave.Taylor@pacificorp.com
yvonne.hogle@pacificorp.com
mark.moench@pacificorp.com
datarequest@pacificorp.com

Chris Parker
William Powell
Dennis Miller
DIVISION OF PUBLIC UTILITIES
500 Heber Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
chrisparker@utah.gov
wpowell@utah.gov
dennismiller@utah.gov

Paul Proctor
ASSISTANT
ATTORNEY GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Cheryl Murray
Dan Gimble
UTAH COMMITTEE OF CONSUMER
SERVICES
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
cmurray@utah.gov
dgimble@utah.gov

Gregory B. Monson
Stoel Rives LLP
201 South Main Street, Suite 1100
Salt Lake City, UT 84111
gbmonson@stoel.com

/s/ Colette V. Dubois
