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Attorneys for Wasatch Wind

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Changes to Renewable Avoided Cost Methodology for Qualifying Facilities Projects Larger than Three Megawatts

Docket No. 12-035-100

PETITION TO INTERVENE OF WASATCH WIND

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Wasatch Wind Intermountain, LLC (Wasatch Wind) hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is an independent wind developer focused on wind projects in the Intermountain West.
2. The legal rights and interests of Petitioner may be substantially affected by this proceeding.
3. Petitioner opposes the “stay” requested by RMP in this docket, but has not yet otherwise fully determined the specific positions it will take or the relief it will seek on other issues. Petitioner seeks to intervene for purposes of protecting its interests as they may appear.

4. Allowing Petitioner to intervene will not materially impair the interests of justice and the orderly and prompt conduct of this proceeding. Petitioner's interests are not and cannot adequately be represented by any other party.

5. Notices in this proceeding should be sent to the following:

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

DATED this 30th day of November, 2012.

/s/ _____
Gary A. Dodge,
Attorney for Wasatch Wind

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 30th day of November, 2012, on the following:

Rocky Mountain Power:

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/s/ _____