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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 MEGAWATS

Docket No. 12-035-100

PETITION FOR LEAVE TO INTERVENE OF SUN EDISON, LLC

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), Sun Edison, LLC (“SE”) hereby petitions for leave to intervene in this docket.

In support of this petition, the Petitioner states as follows:

1. SE, a wholly owned subsidiary of MEMC¹, is one of the world’s leading developers of solar photovoltaic generation systems, with over 950 megawatts of solar under active management. SE designs, builds, owns, operates, and finances these systems on behalf of a diverse customer base, including homeowners, businesses, public sector organizations, and utilities. SE is active in all major U.S. state solar markets, including Utah.
2. SE has significant interest in this docketed matter as it affects the solar

¹ MEMC, based in St. Peters, Missouri, is a global leader in the manufacture and sale of wafers and related products in the semiconductor and solar industries. MEMC’s products are the building blocks for the \$1 trillion and \$35 billion solar cells and modules markets. MEMC’s stock is publically traded on the New York Stock Exchange under the symbol “WFR” and is included in the S&P 500 index.

market opportunity for large qualified solar facilities in Utah.

3. The SE petition for leave to intervene in this docket seeks to ensure SE's ongoing participation in the Rocky Mountain Power avoid cost calculation derivation as it pertains to Schedule 38. SE does not currently know what evidence or testimony it will present in this proceeding.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Sun Edison, LLC to intervene.

5. SE requests that all notices in this proceeding be sent to the following:

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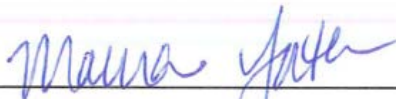
and

Chris Kyler
Kyler, Kohler, Ostermiller & Sorenson
PO Box 599
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WHEREFORE, SE respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

DATED this 24th day of January 2013.

Respectfully submitted,



Maura Yates
Director, Government Affairs
Sun Edison, LLC
602-882-9631
myates@sunedison.com

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of January 2013, I caused to be e-mailed, a true and correct copy of the foregoing to:

Rocky Mountain Power

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