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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 Megawatts	Docket No. 12-035-100 UTAH OFFICE OF ENERGY DEVELOPMENT PETITION TO INTERVENE
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As provided by the November 13, 2012 Scheduling Order, and pursuant to Utah Code Ann. § 63G-4-207 (2009) and Utah Admin. Code R. 746-100-7, the Utah Office of Energy Development petitions for leave to intervene in this docket. In support of the petition, the Office states as follows:

1. Under the direction of the Governor’s energy advisor, the Utah Office of Energy Development serves as the primary resource for advancing energy development in the state, and is to implement the state energy policy and the governor’s energy goals and objectives. Utah Code Ann. § 63M-4-401 (Supp. 2012).

2. On October 9, 2012, Rocky Mountain Power filed for Utah Public Service Commission approval of “a re-examination of the currently effective methodologies for avoided

cost pricing for renewable QFs” [qualifying facilities], specifically pertaining to continued use of the Market Proxy method to produce avoided costs, the implementation of PDDRR (proxy/partial displacement differential revenue requirement) to produce avoided costs, and the ownership of renewable energy attributes (“RECs”) from renewable QF resources. Application ¶¶ 10 and 11.

3. Parties to the docket who currently contract with Rocky Mountain Power for energy from QF’s, describe Rocky Mountain Power’s application as one to change the current QF avoided cost pricing policy. Developers of wind projects, some of whom may have pending applications for QF contracts, and other parties, describe the application as one that will impact renewable energy development in Utah.

4. The Office of Energy Development’s interest in this docket arises from the effect upon energy development in Utah of different avoided cost calculation methods, the volume of renewable energy resources that are eligible for avoided cost contracts, and the terms of those contracts. This information and the consideration of other issues that have been or will be raised in this docket, in relation to the Office of Energy Development’s statutory purpose, demonstrates that the Office’s legal rights, interests and duties may be substantially affected by this docket.

5. The Office of Energy Development requests to intervene for the purpose of representing its interests as they appear, and to participate as the Office determines is necessary and appropriate under Utah Admin. Code R 746-100-5.

6. The interests of justice and the orderly and prompt conduct of the proceedings will not be materially impaired by permitting the Office of Energy Development to intervene.

7. If intervention is granted, the Office of Energy Development requests that all parties provide copies of all pleadings, filings and correspondence with other parties and the Commission, and notice of all matters, hearings or conferences in this docket to:

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And

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DATED this 29th day of March 2013.

/s/ Paul H. Proctor
Paul H. Proctor
Assistant Attorney General
Utah Office of Energy Development

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March, 2013, an original and five (5) true and correct copies of the foregoing UTAH OFFICE OF ENERGY DEVELOPMENT PETITION TO INTERVENE were electronically mail and hand-delivered to:

Gary L. Widerburg
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
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and true and correct copies were electronically mailed to the addresses below:

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