

Ellis-Hall Consultants LLC
835 East 4800 South, Suite 210
Murray, Utah 84017
(801) 281-1414

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of: Blue Mountain Power Partners, LLC's Request that the Public Service Commission of Utah Require PacifiCorp to Provide the Approved Price for Wind Power for the Blue Mountain Project

Docket No. 12-2557-01
Ellis-Hall Consultants, LLC's Petition to Intervene

Pursuant to Utah Code Ann. § 63G-4-207 and Rule 746-100-7, Ellis-Hall Consultants, LLC ("Ellis-Hall") hereby moves for leave to intervene in the above-captioned matter before the Public Service Commission of Utah.

1. On November 8, 2011, PacifiCorp, doing business in Utah as Rocky Mountain Power (the "Company"), filed an application with the Commission for an order approving the Power Purchase Agreement ("PPA") between the Company and Blue Mountain Wind 1, LLC ("Blue Mountain 1") in Docket 11-035-196.

2. Ellis-Hall owns the developmental rights to the properties listed in the Blue Mountain 1 PPA, Exhibits 3.2.4, 3.2.7, and 6.1.

3. This docket relies on the Blue Mountain 1 PPA and, therefore, affects Ellis-Hall's rights in these properties.

4. As such, Ellis-Hall has a direct interest in these proceedings that will not be adequately represented by any other party.

5. Ellis-Hall has not yet fully determined the specific positions it will take or the relief that it will seek.

6. Nevertheless, Ellis-Hall seeks to intervene for purposes of protecting its interests as they arise.

7. Allowing Ellis-Hall to intervene will not unduly broaden the issues, delay the proceedings, or materially impair the interests of justice or orderly and prompt conduct of the proceedings.

8. The following person should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

Tony Hall
Ellis-Hall Consultants, LLC
835 East 4800 South, Suite 210
Murray, Utah 84017
mail@ehc-usa.com

WHEREFORE, for the reasons set forth above, Ellis-Hall requests that the Public Service Commission of Utah grant it leave to intervene in this proceeding to protect its interests.

DATED this 6th day of April 2015.

Respectfully submitted,

Tony Hall
Ellis-Hall Consultants, LLC – Member

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April, 2015, an original and one (1) true and correct copy of the foregoing **Ellis-Hall Consultants, LLC's Petition to Intervene** were hand-delivered to:

Gary L. Widerburg
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, UT 84111

and true and correct copies were electronically mailed to the addresses below:

Chris Parker
Artie Powell
Charles Peterson
Dennis Miller
Division of Public Utilities
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
chrisparker@utah.gov
wpowell@utah.gov
chpeterson@utah.gov
dennismiller@utah.gov

Patricia E. Schmid
Justin Jetter
Assistant Attorneys General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov
jjetter@utah.gov

Paul H. Proctor
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Michele Beck
Cheryl Murray
Office of Consumer Services
200 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mbeck@utah.gov
cmurray@utah.gov

Dave Clark - Legal Counsel
Public Service Commission of Utah
400 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
drexclark@utah.gov

Brian W. Burnett
Callister Nebeker & McCullough
Legal Counsel – Blue Mountain Wind
10 East – South Temple – Ste 900
Salt Lake City UT 84133
brianburnett@cnmlaw.com

Mark C. Moench
Yvonne R. Hogle
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
mark.moench@pacificorp.com
yvonne.hogle@pacificorp.com