

Mrs. Corinne Roring
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Power Purchase Agreement Between PacifiCorp and Blue Mountain Power Partners, LLC

Docket No. 13-035-115

NOTICE OF INTENT TO FILE EMERGENCY PETITION TO INTERVENE OF MRS. CORINNE RORING, TRUSTEE OF THE JOHN EDWARD RORING AND CORINNE NIELSON RORING REVOCABLE LIVING TRUST DATED DECEMBER 28, 1992 AND OBJECTION TO APPROVAL OF POWER PURCHASE AGREEMENT BETWEEN PACIFICORP AND BLUE MOUNTAIN POWER PARTNER, LLC

Pursuant to Utah Code Ann. § 63G-4-207, Utah Code Ann. § 63G-4-502 , Rule R746-100-7 Intervener and Petitioner Mrs. Corinne Nielson Roring (“Intervener”), respectfully requests for leave to give notice of intent to file an emergency petition to intervene in this docket and object to the Public Service Commission of the State of Utah ("Commission")'s Approval of the Power Purchase Agreement ("PPA") between Pacificorp and Blue Mountain Power Partners, LLC.

In support of this Notice of Intent to file Emergency Petition, Intervener states as follows:

1. Intervener is the Trustee for land located in South Utah, San Juan County to be identified in the Emergency Petition.

2. Gary Dodge, Esq., who represents Blue Mountain Power Partners, LLC made arguments before the Commission where he stated that a company had filed an intervention petition the following “...if it wants to intervene, needs to, first of all, state its basis for having an interest here that has been effected. They have alleged some concerns they want to raise. They haven’t alleged an issue – any legal right or interest that will be substantially affected, like is required – as is required under the statute.”¹

3. Intervener believes Title 63G, Chapter 4, Section 207, c was not completely satisfied beyond question until the Testimony of Mr. Michael Cutbirth, in the Hearing before the Commission on September 19, 2013.

4. As a result of Mr. Cutbirth's Testimony, requests have been filed in accordance with the Freedom of Information Act and the laws relating to Grama Request for Records in the State of Utah for crucial documentation necessary to support and prove the elements in the Emergency Petition Intervener intends to file. This information, and the September 19, 2013 testimony of Mr. Cutbirth are significant components of Intervener's Emergency Petition. Receipt of this information by Intervener has likely been affected by the present Government Shutdown.

5. Intervener is seeking to secure the necessary documentation by other means that may be available.

6. Intervener has a direct interest in these proceedings and the outcome may have a substantial effect upon Intervener.

7. Intervener seeks to protect her interests, pursuant to Title 63G, Chapter 4, Section 207, c and other applicable Utah State Law and Regulations.

¹ See Lines 19 – 25 on page 7 of the Reporter’s Transcript filed on August 5, 2013 for the August 2, 2013 in Public Service Commission Docket No. 13-035-115.

8. Presently, Intervener's interest in the outcome of these proceedings will not adequately be represented by any other party.

9. Intervener's participation will not impair the conduct of the proceeding.

10. Intervener will ensure ten (10) copies of this Notice of Intent to file Emergency Petition will be filed with the Commission.

11. Thank you for your time and consideration.

Mrs. Corinne Nielson Roring,
Land Owner in Monticello, Utah

Dated: October 1, 2013

CERTIFICATE OF SERVICE

I certify that a true and correct copy of NOTICE OF INTENT TO FILE EMERGENCY PETITION TO INTERVENE OF MRS. CORINNE RORING, TRUSTEE OF THE JOHN EDWARD RORING AND CORINNE NIELSON RORING REVOCABLE LIVING TRUST DATED DECEMBER 28, 1992 AND OBJECTION TO APPROVAL OF POWER PURCHASE AGREEMENT BETWEEN PACIFICORP AND BLUE MOUNTAIN POWER PARTNER, LLC in the State of Utah Public Service Commission Docket No. 13-035-116 was served no later than the 1st day of October, 2013 on the following:

PACIFICORP & ROCKY MOUNTAIN POWER:

Mark Moench	mark.moench@pacificorp.com
Yvonne Hogle	yvonne.hogle@pacificorp.com
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OFFICE OF CONSUMER SERVICES:

Brent Coleman	brentcoleman@utah.gov
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BLUE MOUNTAIN POWER PARTNERS, LLC:

Gary A. Dodge	gdodge@hjdllaw.com
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ELLIS-HALL CONSULTANTS, LLC:

Mary Anne Q. Wood	mawood@woodbalmforth.com
Stephen Q. Wood	swood@woodbalmforth.com

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UTAH CLEAN ENERGY

Sophie Hayes	sophie@utahcleanenergy.org
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Mrs. Corinne Nielson Roring,