

Sophie Hayes (12546)  
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*Attorney for Utah Clean Energy*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Blue Mountain Power Partners, LLC	<b>DOCKET NO. 13-035-115</b> <b>Utah Clean Energy Petition to Intervene</b>
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin.Code R746-100-7, Utah Clean Energy petitions for leave to intervene in this docket. In support of this petition, Utah Clean Energy states as follows:

1. Utah Clean Energy is a non-profit, public interest organization working to create healthy, thriving communities, empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on stopping energy waste, creating clean energy, and building a smart energy future.

2. As a state-based advocate for renewable energy and a clean energy future, Utah Clean Energy's legal rights and interests may be substantially affected by this proceeding that will impact renewable energy development in Utah.

3. Utah Clean Energy seeks to intervene in support of Rocky Mountain Power's application for approval of the power purchase agreement, and for the purpose of protecting its interests as they arise.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Utah Clean Energy to intervene.

5. Utah Clean Energy's interests are not adequately represented by another party in this proceeding.

6. If Utah Clean Energy is granted leave to intervene in this proceeding, notices and filings should be sent to the following:

Sophie Hayes  
Sarah Wright  
UTAH CLEAN ENERGY  
1014 2<sup>nd</sup> Avenue  
Salt Lake City, UT 84111  
sophie@utahcleanenergy.org  
sarah@utahcleanenergy.org

WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 26<sup>th</sup> day of August, 2013.

UTAH CLEAN ENERGY

/s/ \_\_\_\_\_  
Sophie Hayes  
Attorney for Utah Clean Energy

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 26<sup>th</sup> day of August, 2013, on the following:

**ROCKY MOUNTAIN POWER:**

Mark Moench	mark.moench@pacificorp.com
Daniel. E. Solander	daniel.solander@pacificom.com
David L. Taylor	dave.taylor@pacificorp.com

**DIVISION OF PUBLIC UTILITIES:**

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**OFFICE OF CONSUMER SERVICES:**

Brain Farr	bfarr@utah.gov
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**BLUE MOUNTAIN POWER PARTNERS, LLC:**

Gary A. Dodge	gdodge@hjdllaw.com
Michael D. Cutbirth	mcutbirth@champlinwind.com

**ELLIS-HALL CONSULTANTS, LLC:**

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