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Counsel for The Alliance for Solar Choice

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Investigation of the  
Costs and Benefits of Pacificorp's Net  
Metering Program

**Docket No. 14-035-114**

**PETITION TO INTERVENE OF  
THE ALLIANCE FOR SOLAR  
CHOICE**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7,  
The Alliance for Solar Choice ("TASC") hereby petitions for leave to intervene in the  
above-captioned proceeding before the Public Service Commission of Utah  
("Commission"). In support, TASC states as follows:

1. The Commission's *Report and Order* in Docket No. 13-035-184, issued  
on August 29, 2014, established this docket for consideration and development of an  
analytical framework to evaluate the relative costs and benefits of the net metering  
program.

2. On March 19, 2015, the Commission issued the *First Order Amending  
Scheduling Order and Notices of Workgroup Meetings, Hearing and Public Witness  
Hearing* and set a deadline of April 2, 2015 for petitions for intervention by parties that  
wish to participate in confidential settlement meetings.

3. The Alliance for Solar Choice (“TASC”) leads advocacy across the country for the rooftop solar industry. Founded by the largest rooftop solar companies in the United States, TASC represents the vast majority of the rooftop solar market nationwide. Its members include Demeter Power, Silevo, SolarCity, Solar Universe, Sunrun, Verengo, and ZEP.

4. TASC was formed on the belief that consumer’s should have the option to switch to onsite solar power for at least a portion of their energy supply. Accordingly, TASC is committed to defending policies, such as net metering, that provide fair credit to residents, businesses, churches, schools, and public agencies when their rooftop solar systems export power to a utility’s grid.

5. TASC intervened and was granted party status in Docket No. 13-035-184, a general rate case proceeding where Rocky Mountain Power sought authority to impose a fixed charge on net metering customers. In that case, TASC presented testimony supporting the establishment of a separate proceeding to develop an analytical framework to be used to determine the costs and benefits of the net metering program. TASC’s position was and is that the Commission must make a determination of the costs and benefits of the net metering program before it can approve a charge that solely applies to net metering customers.

6. TASC has a direct and continuing interest in the development of such a framework, as the Commission is likely to use the framework to determine whether future net metering rate proposals are just and reasonable. The development of the analytical framework directly impacts TASC’s central purpose of defending policies that

provide fair credit to utility customers for electricity that is exported from their rooftop solar systems and support the sustained growth of the market for solar services.

7. TASC's interest in the outcome of these proceedings will not be adequately represented by any other party and TASC's participation will not broaden the scope of issues or delay the conduct of this proceeding. TASC's Petition to Intervene is timely filed. TASC's participation will promote the public's interest in a robust market for customer-sited solar energy in the state of Utah.

8. TASC requests that all communications regarding this matter to be directed, via electronic mail, to the following persons:

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\* Mr. Culley will separately file a *Notice of Appearance of Attorney Licensed in a Foreign State* to appear as TASC's Co-Counsel in this proceeding.

For these reasons, TASC respectfully requests that the Commission grant its Petition to Intervene and permit TASC to participate in this proceeding as a party with all of the rights attached thereto.

Respectfully submitted on this 30<sup>th</sup> Day of March, 2015.

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Counsel for The Alliance for Solar Choice

## CERTIFICATE OF SERVICE

I hereby certify that I will cause a true and correct copy of the foregoing **PETITION TO INTERVENE OF THE ALLIANCE FOR SOLAR CHOICE** to be dispatched via overnight delivery to be filed with the Utah Public Service Commission on March 30, 2015 and to be served via email on that day upon the following persons:

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Office of Consumer Services

Dated March 30, 2015 at Cary, North Carolina.

/s/ Thadeus B. Culley  
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