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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 INTERSTATE RENEWABLE
ENERGY COUNCIL, INC.**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, the Interstate Renewable Energy Council, Inc. (IREC) hereby petitions for leave to intervene in the above-captioned proceeding before the Public Service Commission of Utah (Commission).

In support, IREC 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 costs and benefits of PacifiCorp's net metering program.
2. On March 30, 2015, the Commission issued an Errata and Second Order Amending Scheduling Order and set a deadline of April 9, 2015 for petitions for intervention by parties that wish to participate in confidential settlement meetings.
3. Pursuant to the March 30, 2015 Errata and Second Order Amending Scheduling Order, IREC's Petition to Intervene is timely filed.
4. IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to expand and simplify consumer access to reliable and affordable distributed clean

energy by: (1) developing and advancing regulatory policy innovations; (2) generating and promoting national model rules, standards, and best practices; and (3) providing workforce training, education, and credentialing. IREC works independently from renewable energy industries, trade associations, technologies, and advocacy organizations; and, though we promote the creation of robust, competitive clean energy markets, IREC does not have a financial stake in those markets. Grounded in the latest research and objective analysis, IREC's work helps inform and guide fact-based regulatory decision-making and workforce development efforts. Through collaborative partnerships with diverse stakeholders, IREC seeks to build consensus and achieve workable solutions to create a sustainable and economically strong clean energy future.

5. The scope of IREC's work includes expanding programs that facilitate consumers' ability to host a renewable energy system to directly self-supply energy needs or provide energy to the grid, and ensuring realistic and accurate assumptions about distributed energy resources are reflected in utility regulatory decision-making.
6. As part of this work, IREC has published *A Regulator's Guidebook: Calculating the Benefits and Costs of Distributed Solar Generation*.¹ The *Regulator's Guidebook* provides standardized approaches for the various benefits and costs and explains how to calculate them regardless of the structure of the program or rate in which this valuation is used.

¹ Available at www.irecusa.org/a-regulators-guidebook-calculating-the-benefits-and-costs-of-distributed-solar-generation.

7. In the past, IREC was actively engaged in Docket 08-035-78, Net Metering Service; Rulemaking Docket R746-312, Electrical Interconnection; and Docket 09-999-12, Third-Party Arrangements for Renewable Energy Generation. As a party to those dockets, IREC filed numerous comments and participated in several technical conferences, workgroup discussions, and stakeholder meetings. IREC has also signed on to joint comments filed with the Commission on related renewable energy matters. In addition, IREC is currently or has recently been engaged in net metering and solar valuation dockets in Nevada, Arizona, Colorado, California, Iowa, Oregon, Ohio, and New York.
8. IREC has a substantial, direct and continuing interest in the development of an analytical framework to evaluate the costs and benefits of PacifiCorp's net metering program, especially because the Commission is likely to use the framework to evaluate future net metering program changes. The development of the analytical framework directly impacts IREC's work nationally on the valuation of distributed solar generation and other distributed energy resources, and our work on net metering and other self-generation programs.
9. IREC's interest in the outcome of these proceedings will not be adequately represented by any other party and IREC's participation will not broaden the scope of issues or delay the conduct of this proceeding.
10. IREC requests that all communications regarding this matter to be directed, via electronic mail, to:

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

Respectfully submitted on this 9th day of April, 2015.



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