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*Attorneys for Intermountain Wind and Solar, LLC*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program	<b>DOCKET NO. 14-035-114</b> <b>PETITION TO INTERVENE OF INTERMOUNTAIN WIND AND SOLAR, LLC</b>
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Intermountain Wind and Solar, LLC (“Intermountain Wind and Solar”) petitions the Public Service Commission of Utah (“Commission”) for intervention in the above-entitled matter pursuant to Utah Code Ann. § 63G-04-207 and Utah Admin. Code R746-100-7.

In support of this Petition to Intervene, Intermountain Wind and Solar, represents and states as follows:

1. On November 18, 2016, the Commission issued the Scheduling Order and Notices of Hearing and Public Witness Hearing and set a deadline of December 20, 2016 for petitions for intervention by parties that wish to participate in the phase of this proceeding that will address Rocky Mountain Power’s (“RMP”) Compliance Filing and “potentially dispositive legal issues” related to that filing.
2. Intermountain Wind and Solar is a Utah entity with its headquarters at 1953 West 2425 South, Woods Cross, Utah 84087 and is in the business of providing solar energy services to both residential and commercial customers throughout the state of Utah who generate solar power and participate in the net metering program.

3. Intermountain Wind and Solar is interested in these proceeding due to the effect that passage of the propose tariff would have on ability to continue business in the state of Utah. The success of Intermountain Wind and Solar's business is directly tied to the return on investment that can be realized by potential customers and therefore this preceding can have a dramatic effect on the financial outlook for the company and the ability to keep employees employed. Intermountain Wind and Solar is adamantly opposed to the changes Rocky Mountain Power ("RMP") has proposed in to Schedule 135 and to the proposed Schedule 135A.
4. Intermountain Wind and Solar has a significant interest in the above-captioned matter and its legal rights or interests may be substantially affected by the outcome.
5. Intermountain Wind and Solar's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings.
6. Intermountain Wind and Solar's interests are not adequately represented by another party in this proceeding.
7. Intermountain Wind and Solar requests that copies of all notices and filings in this docket be served on:

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Please serve all documents electronically whenever possible.

NOW THEREFORE, Intermountain Wind and Solar respectfully requests that the Commission enter an Order granting Intermountain Wind and Solar's Petition to Intervene in this docket allowing Intermountain Wind and Solar to participate to the fullest extent allowed by law.

Dated this 20<sup>th</sup> day of December, 2016.

Kirton McConkie

/s/ Brian W. Burnett  
Brian W. Burnett

## Certificate of Service

I hereby certify that on December 20<sup>th</sup>, 2016, I caused a true and correct copy of the foregoing Petition to Intervene of Intermountain Wind and Solar, LLC to be emailed to the following:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
PacifiCorp

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