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Before the Public Service Commission of Utah

In the Matter of Investigating of Costs and Benefits of PacifiCorp's Net Metering Program	Docket No. 14-035-114 The Office of Consumer Services' Objection to Intervention of Brian C. Hall
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code r746-100-5 the Office of Consumer Services ("Office") respectfully submits its Objection to Intervention of Brian C. Hall for the reason that Mr. Hall does not meet the requisite criteria for intervention pursuant to state law.

Utah Code Ann. § 63G-4-207 sets forth two criteria that a potential intervenor must demonstrate before intervention is granted, specifically;

- (2) The presiding officer shall grant a petition for intervention if the presiding officer determines that:
  - (a) the petitioner's legal interests may be substantially affected by the formal adjudicative proceeding; and
  - (b) the interests of justice and the orderly and prompt conduct of the adjudicative proceedings will not be materially impaired by allowing the intervention.

Mr. Hall's December 9, 2016 Application for Motion to Intervene alleges no legal interest that will be substantially affected by the proceedings in this docket. In fact, at paragraph 5 of the Application, Mr. Hall states that he is neither a net metering customer nor does he have any business interests associated with the solar industry. He does represent that he is customer of Rocky Mountain Power. However, the Utah courts have recently stated that simply being a ratepayer, without more, is not sufficient to grant standing to an individual. *In re Questar Gas Co.*, 2007 UT 79, ¶ 36, 175 P.3d 545; *Uhlig v Public Service Commission*, 2014 UT App. 232, ¶ 6, 336 P3d. 1104.

Mr. Hall's interests as a ratepayer are represented in this proceeding by the Office of Consumer Services which is statutorily charged with advocating "a position most advantageous to...residential customers" Utah Code Ann. § 54-10-301(c)(i). Finally, because there are literally tens of thousands of individual ratepayers in the Company service area, allowing individual rate payers to intervene in this or any docket will very likely result in an unwieldy if not impossible number of "parties" in this proceeding.

Wherefore, the Office respectfully request that the Application for Motion to Intervene be denied.

DATED, December 23, 2016

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Robert J. Moore  
*Attorney for the Office of Consumer Services*