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Attorneys for Ellis-Hall Consultants, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Request of Rocky Mountain Power for a Limited Stay of Schedule 38, Qualifying Facility Procedures	Docket No. 14-035-65 <i>PETITION TO INTERVENE OF ELLIS-HALL CONSULTANTS, LLC</i>
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Pursuant to Utah Code Ann. § 63G04-207 and Rule R-746-100-7, Petitioner Ellis Hall Consultants, LLC (“EHC”) hereby petitions for leave to intervene in this docket.

In support of this Petition, EHC states as follows:

1. EHC is the developer of wind energy projects. Among other things, in violation of Schedule 38, Rocky Mountain Power (“PacifiCorp”) has refused to provide EHC indicative pricing on or within 30 days of EHC’s completion of all requirements of Paragraph I.B.2.

2. The interests of EHC are more fully set forth in Ellis-Hall’s Objection to Rocky Mountain Power’s Request for Stay, filed on this date.

3. The legal rights and interests of EHC will be substantially affected by this proceeding.

4. EHC seeks to intervene to oppose PacifiCorp's Request for a Limited Stay of Schedule 38, Qualifying Facility Procedures.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing EHC to intervene.

6. Notices and filings in this proceeding should be sent to the following

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Ellis Hall Consultants, LLC
P.O. Box 572098
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Attn: Ms. Kimberly Ceruti

WHEREFORE, EHC seeks leave to intervene in this proceeding to protect its interests.

DATED this 6th day of June, 2014.

WOOD BALMFORTH LLC

/s/ Stephen Q. Wood

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June, 2014 a true and correct copy of this Petition to Intervene of Ellis Hall Consultants, LLC was served upon the following via electronic mail:

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/s/ Stephen Q. Wood
