

Lisa Tormoen Hickey, Colo. Reg. #15046
Alpern Myers Stuart LLC
14 North Sierra Madre, Suite A
Colorado Springs, CO 80903
Telephone: 719-471-9231 or 719-964-5526
E-mail: lisahickey@coloradolawyers.net

BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s Proposed)
Electric Service Schedule 32, Service from Renewable) Docket No. 14-035-T02
Energy Facilities)
)

**PETITION TO INTERVENE AND MOTION
OF FOREIGN ATTORNEY TO REPRESENT PARTY**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), the Interwest Energy Alliance (“Interwest”) hereby files:

- a) its petition to intervene pursuant to Utah Public Service Commission Rule R746-100-6 (B); and
- b) its motion for undersigned counsel to represent Interwest in this proceeding pursuant to Utah Administrative Procedures Act Sec. 63G-4-207 (1) and, in support thereof, states as follows:

A. PETITION TO INTERVENE

1. Interwest Energy Alliance is a 501(c)(6) trade association of wind and solar project developers and equipment manufacturers working with the non-governmental conservation community to promote renewable energy in Utah, Colorado, Wyoming, Nevada, Arizona and New Mexico. Interwest has been actively engaged in public input processes and regulatory dockets in Wyoming and Utah related to Rocky Mountain Power’s resource planning and other proceedings to promote additional acquisitions of renewable energy. Interwest has also been engaged in

promoting voluntary and direct acquisition market opportunities around the West, similar to those represented by Senate Bill 12 and the proposed Schedule 32 tariff filed to implement the statute.

2. Interwest members have valuable pecuniary interests which may be substantially affected by this proceeding. Its members include independent power producers operating in Utah which will likely offer their renewable energy to Utah ratepayers through facilities using the proposed tariff developed in this docket. Interwest's board members include environmental organizations working in Utah and in other states to promote renewable energy market development through direct sales to commercial interests. All of these member companies and organizations promote regulatory best practices which will incentivize growth in the renewable energy markets.

3. No other party to the proceeding will advocate for or represent the interest of Interwest's independent power producer members. Interwest does not currently know what evidence, if any, it would present in this proceeding. Therefore, Interwest requests that its intervention be granted and it be given party status in this proceeding.

4. Interwest's petition for leave to intervene is timely filed. Interwest's participation will not affect or impede the just, orderly and prompt conduct of these proceedings. Intervention by Interwest will not unduly broaden the issues or delay the proceeding, because its interests reflect appropriate development of a tariff within the scope of the proposed tariff filed by Rocky Mountain Power herein.

THEREFORE, Interwest requests permission to intervene in this docket.

**B. MOTION FOR PERMISSION TO BE REPRESENTED
BY OUT-OF-STATE ATTORNEY**

1. Pursuant to Rule R746-100-6(B) of the Rules of Practice and Procedure of the Utah Public Service Commission, Interwest moves the Commission to allow the undersigned attorney, licensed in Colorado and Wyoming, be allowed to represent it in this proceeding without associated Utah counsel. Hiring local representation by an attorney licensed in Utah would pose an unreasonable hardship and financial burden upon Interwest. Interwest has already engaged the undersigned on a regular basis to participate in regulatory proceedings, and it would be costly to engage local counsel who would have to be retained in addition to the undersigned. The undersigned represents Interwest on a regular basis related to multi-state activities, and has previously represented Interwest in Utah regulatory dockets, including Docket No. 13-2035-01 and Docket No. 11-2035-01. Interwest regularly collaborates with other regulatory counsel in Utah. As a 501(c)(6) non-profit corporation, Interwest has limited funds, which are used to meet its goals consistent with the mission for which it was formed. The purpose and scope of intervention is to file comments and/or expert testimony and to obtain discovery. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court October 16, 2003.

THEREFORE, Interwest respectfully requests that the Commission grant its petition for leave to intervene in this proceeding and for the undersigned to be allowed to act as counsel to represent Interwest as a party to this action.

Further, if the foregoing is approved, Interwest requests that all pleadings, correspondence, discovery and other documents be served on the undersigned counsel for Interwest.

Respectfully submitted this 21st day of July, 2014.

/s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey, Colo. Reg. #15046

Alpern Myers Stuart LLC

14 North Sierra Madre, Suite A

Colorado Springs, CO 80903

Telephone: 719-471-9231 or 719-964-5526

E-mail: lisahickey@coloradolawyers.net

On Behalf of Interwest Energy Alliance

Interwest Energy Alliance
Sarah Cottrell Propst, Executive Director
P.O. Box 8526
341 East Alameda
Santa Fe, NM 87504-8526
propst@interwest.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 21 day of July, 2014, on the following:

By Electronic-Mail:

Data Request Response Center (datarequest@pacificorp.com)
PacifiCorp

Dave Taylor (dave.taylor@pacificorp.com)
Daniel E. Solander (daniel.solander@pacificorp.com)
Rocky Mountain Power

Jerold G. Oldroyd (oldroydj@ballardspahr.com)
Theresa A. Foxley (foxleyt@ballardspahr.com)
Ballard Spahr LLP

Peter J. Mattheis (pjm@bbrslaw.com)
Eric J. Lacey (elacey@bbrslaw.com)
Brickfield, Burchette, Ritts & Stone, P.C.

Jeremy R. Cook (jrc@pkhlawyers.com)
Parsons Kinghorn Harris, P.C.

William J. Evans (bevans@parsonsbehle.com)
Vicki M. Baldwin (vbaldwin@parsonsbehle.com)
Parsons Behle & Latimer

Gary A. Dodge (gdodge@hjdllaw.com)
Hatch, James & Dodge

Kevin Higgins (khiggins@energystrat.com)
Neal Townsend (ntownsend@energystrat.com)
Energy Strategies

Roger Swenson (roger.swenson@prodigy.net)
E-Quant Consulting LLC

Travis Ritchie (travis.ritchie@sierraclub.org)
Gloria D. Smith (gloria.smith@sierraclub.org)
Sierra Club

David Wooley (dwooley@kfwwlaw.com)
Keyes, Fox & Wiedman LLP
Arthur F. Sandack, Esq. (asandack@msn.com)
IBEW Local 57

Kurt J. Boehm, Esq. (kboehm@BKLawfirm.com)
Jody Kyler Cohn, Esq. (Jkylercohn@BKLawfirm.com)
Boehm, Kurtz & Lowry

Brian W. Burnett, Esq. (brianburnett@cnmlaw.com)
Callister Nebeker & McCullough

Stephen J. Baron (sbaron@jkenn.com)
J. Kennedy & Associates

Sophie Hayes (sophie@utahcleanenergy.org)
Utah Clean Energy

Capt Thomas A. Jernigan (Thomas.Jernigan@us.af.mil)
Mrs. Karen White (Karen.White.13@us.af.mil)
USAF Utility Law Field Support Center

Meshach Y. Rhoades, Esq. (rhoadesm@gtlaw.com)
Greenberg Traurig
Steve W. Chriss (Stephen.Chriss@wal-mart.com)
Wal-Mart Stores, Inc.

Anne Smart (anne@allianceforsolarchoice.com)
The Alliance for Solar Choice

Michael D. Rossetti (solar@trymike.com)

/s/ _____