

David W. Pershing, Ph.D.  
President  
University of Utah  
201 Presidents Circle, Room 201  
Salt Lake City, UT 84112

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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**In the Matter of Rocky Mountain Power's  
Proposed Electric Service Schedule No. 32,  
Service from Renewable Energy Facilities**

**Docket No. 14-035-T02**

**University of Utah  
Petition for Leave to Intervene**

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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, the University of Utah ("Petitioner"), petitions for leave to intervene in this docket. In support of this petition, Petitioner states as follows:

1. Petitioner is one of the state's largest consumers of electrical energy.
2. On April 25, 2014, Rocky Mountain Power dba PacifiCorp ("PacifiCorp") filed Advice No. 14-02, requesting approval of Electric Service Schedule No. 32, Service from Renewable Energy Facilities ("Schedule 32"). PacifiCorp's proposed Schedule 32 provides prices for services required to facilitate renewable energy contracts that qualify under Utah Senate Bill 12.
3. Affordable renewable energy is a significant focal point and priority for Petitioner.
4. The ability to cost effectively purchase clean, renewable energy from renewable energy facilities disparately sited, using the existing, regulated



transmission and distribution systems, has the potential to provide significant benefits to large energy-using customers in Utah, including Petitioner. These benefits include, but are not limited to:

- Partial protection against inflation and future increases or volatility in electricity costs, by locking in prices of renewable energy for 20+ years
- Renewable facilities and infrastructure can be developed away from extremely valuable, limited footprint campus land, and the size of remote installations can accommodate more generating-capacity than on-site renewable facilities and related infrastructure.

5. The Public Service Commission order regarding the structure and reasonable cost effectiveness of electric Schedule 32 will substantially affect Petitioner's legal rights and interests.

6. Petitioner has not fully determined specific positions it will take or the relief it will seek. Petitioner seeks to intervene for purposes of protecting its interests as they arise.

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

8. If Petitioner is granted leave to intervene in this proceeding, notices should be sent to the following:

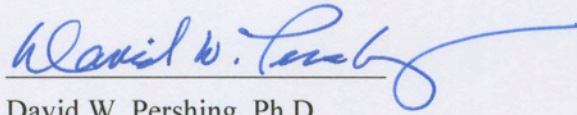
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WHEREFORE, the University of Utah requests leave to intervene in this proceeding to protect its interests as they may arise.



DATED this 23<sup>rd</sup> day of September, 2014.

University of Utah

A handwritten signature in blue ink, appearing to read "David W. Pershing", written over a horizontal line.

David W. Pershing, Ph.D.

President



## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 23<sup>rd</sup> day of September, 2014, on the following:

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