

Ellis-Hall Consultants, LLC
835 East 4800 South, Suite 210
Murray, Utah 84017
(801) 281-1414

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of: the Application of Rocky Mountain Power for Modification of Contract Term of PURPA Power Purchase Agreements with Qualifying Facilities

Docket No. 15-035-53
Ellis-Hall Consultants, LLC's Petition to Intervene

Pursuant to Utah Code Ann. § 63G-4-207 and Rule 746-100-7, Ellis-Hall Consultants, LLC ("Ellis-Hall") hereby moves for leave to intervene in the above-captioned matter before the Public Service Commission of Utah (the "Commission").

1. Ellis-Hall is a qualifying power producer within the meaning of Utah Code Ann. § 54-12-2.
2. Ellis-Hall has not yet fully determined the specific positions it will take or the relief that it will seek.
3. Nevertheless, Ellis-Hall seeks to intervene for purposes of protecting its interests as they arise.
4. Ellis-Hall's interest in these proceedings that will not be adequately represented by any other party.

5. Allowing Ellis-Hall to intervene will not unduly broaden the issues, delay the proceedings, or materially impair the interests of justice or orderly and prompt conduct of the proceedings.

6. The following person should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

Tony Hall
Ellis-Hall Consultants, LLC
835 East 4800 South, Suite 210
Murray, Utah 84017
mail@ehc-usa.com

WHEREFORE, for the reasons set forth above, Ellis-Hall requests that the Public Service Commission of Utah grant it leave to intervene in this proceeding to protect its interests.

DATED this 9th day of June 2015.

Respectfully submitted,

/s/ Tony Hall
Tony Hall
Ellis-Hall Consultants, LLC – Member

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of June, 2015, an original and ten (10) true and correct copy of the foregoing **Ellis-Hall Consultants, LLC's Petition to Intervene** were hand-delivered to:

Utah Public Service Commission
160 East 300 South
Salt Lake City, UT 84111

and true and correct copies were electronically mailed to the addresses below:

Utah Public Service Commission: psc@utah.gov

Rocky Mountain Power:
 Jeff Richards jeff.richards@pacificorp.com
 Yvonne Hogle yvonne.hogle@pacificorp.com
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/s/ Tony Hall

Tony Hall
Ellis-Hall Consultants, LLC – Member