

J. Craig Smith (04143)
(jcsmith@smithlawonline.com)
Adam S. Long (14701)
(along@smithlawonline.com)
SMITH HARTVIGSEN, PLLC
175 South Main Street, Suite 300
Salt Lake City, Utah 84111
Telephone: (801) 413-1600
Facsimile: (801) 413-1620
Counsel for the Renewable Energy Coalition

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 PETITION TO INTERVENE OF THE RENEWABLE ENERGY COALITION
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Renewable Energy Coalition (the “**Coalition**”) respectfully petitions the Public Service Commission (“**Commission**”) for leave to intervene in this docket regarding the proposed modification of contract terms of PURPA power purchase agreements. In support of this petition, Renewable Energy Coalition states as follows:

1. The Coalition was established in 2009, and is comprised of thirty-two members who own and operate over fifty non-intermittent small renewable energy generation qualifying facilities (“**QFs**”) in Oregon, Idaho, Montana, Washington, Utah, and Wyoming. Several types of entities are members of the Coalition, including irrigation districts, water districts, corporations, and individuals.

2. The Coalition’s goal is to ensure fair and reasonable contract terms and conditions, and avoided cost rates for small projects eligible for Schedule 37 prices. The Coalition’s members are

primarily existing QFs, and our goal is to ensure that any final order in this proceeding recognizes and accounts for the unique circumstances and benefits of existing projects.

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

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the Coalition to intervene. This request is submitted in advance of that deadline for intervention of October 1, 2015 for this docket.

5. The Coalition's interests are not adequately represented by another party in this proceeding.

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

J. Craig Smith

Adam S. Long
Smith Hartvigsen, PLLC
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Salt Lake City, UT 84111
801-413-1600
jcsmith@smithlawonline.com
along@smithlawonline.com

WHEREFORE, the Renewable Energy Coalition requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 16th day of September, 2015.

Respectfully Submitted,
SMITH HARTVIGSEN, PLLC

/s/ Adam S. Long
J. Craig Smith
Adam S. Long
Attorneys for the Renewable Energy Coalition

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 16th day of September, 2015 upon the following as indicated below:

Via hand delivery and email to:

UTAH PUBLIC SERVICE COMMISSION
c/o Gary Widerburg, Commission Secretary
160 East 300 South, Fourth Floor
Salt Lake City, Utah 84111
psc@utah.gov

Via e-mail to:

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

Robert C. Lively (bob.lively@pacificorp.com)
Yvonne R. Hogle (yvonne.hogle@pacificorp.com)
Daniel E. Solander (daniel.solander@pacificorp.com)
Rocky Mountain Power

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

Tony Hall (mail@ehc-usa.com)
Ellis-Hall Consultants, LLC

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

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

Dan Patry (dpatry@sunedison.com)
SunEdison

Patricia Schmid (pschmid@utah.gov)
Justin Jetter (jjetter@utah.gov)
Rex Olsen (rolsen@utah.gov)
Utah Assistant Attorneys General

/s/ Adam S. Long