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Attorneys for the Rocky Mountain
Coalition for Renewable Energy

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 ROCKY MOUNTAIN COALITION FOR RENEWABLE ENERGY
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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, the Rocky Mountain Coalition for Renewable Energy (“Coalition”), hereby petitions for leave to intervene in this docket.

In support of this petition, the Coalition states as follows:

1. The Coalition is an unincorporated, informal coalition formed for the purpose of opposing the efforts of Rocky Mountain Power (“RMP”) in Utah and Wyoming to limit the maximum term of Qualifying Facility (“QF”) power purchase agreements (“PPAs”) to three years. Current Coalition supporters include RMP customers and owners and developers of renewable energy projects in the Western United States and elsewhere, including the Utah Association of

Energy Users (“UAE”), EverPower Wind Holdings Inc., Scatec Solar North America, Inc., SunEdison, Sustainable Power Group (“sPower”) and Wasatch Wind.

2. The legal rights and interests of the Coalition and its supporters will be substantially affected by this proceeding and will not be adequately represented by any other party.

3. While the Coalition has not yet determined all of the positions that it may take in this matter, it strongly opposes Rocky Mountain Power’s attempt to reduce the maximum term of QF PPAs to three years as contrary to the public interest. The Coalition seeks to intervene for the purpose of protecting its interests and the interests of its supporters as they may appear.

4. Allowing the Coalition to intervene will not materially impair the interests of justice and the orderly and prompt conduct of this proceeding.

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

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WHEREFORE, the Coalition requests leave to intervene in this proceeding to protect its interests and the interests of its supporters as they may appear.

DATED this 16th day of September, 2015.

HATCH, JAMES & DODGE

/s/ _____
Gary A. Dodge
Attorneys for the Coalition

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 16th day of September 2015 on the following:

Public Service Commission: psc@utah.gov

Rocky Mountain Power:

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/s/ _____