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Attorneys for Three Peaks Power, LLC

Submitted October 2, 2015

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)	
Rocky Mountain Power for Approval of)	Docket No. 15-035-70
the Power Purchase Agreement between)	
PacifiCorp and Three Peaks Power, LLC)	PETITION TO INTERVENE OF
)	THREE PEAKS POWER, LLC
)	

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Three Peaks Power, LLC (“Three Peaks Power”) respectfully petitions the Public Service Commission of Utah (the “Commission”) for leave to intervene in the above-captioned docket concerning the Application of Rocky Mountain Power for approval of the Power Purchase Agreement between PacifiCorp and Three Peaks Power, LLC.

In support of this Petition to Intervene, Three Peaks Power represents and states as follows:

1. Three Peaks Power develops commercial and utility-scale solar power projects. Its capabilities include designing, constructing, operating, and maintaining solar power plants. It is currently developing projects in the Intermountain West, including Utah.

2. In this Docket, Rocky Mountain Power is requesting Commission approval of the Power Purchase Agreement between PacifiCorp and Three Peaks Power. As the seller, Three Peaks Power intends to construct, own, operate and maintain the solar-powered generation facility for the generation of electric energy located in Iron County, Utah.

3. As such, Three Peaks Power's legal rights and interests may be substantially affected by this proceeding.

4. Intervention by Three Peaks Power will not unduly broaden the issues, delay the proceeding, or materially impair the orderly and prompt conduct of the proceeding.

5. Three Peaks Power's interests are not and cannot be adequately represented by any other party.

6. Notices in this proceeding should be sent to the following:

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WHEREFORE, Three Peaks Power requests, by and through its counsel, that the Commission enter an Order granting Three Peaks Power's Petition to Intervene as a party in this Docket.

RESPECTFULLY SUBMITTED this 2nd day of October 2015.

THREE PEAKS POWER, LLC

/s/ Jerold G. Oldroyd

Jerold G. Oldroyd, Esq.

Sharon M. Bertelsen, Esq.

BALLARD SPAHR LLP

Attorneys for Three Peaks Power, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of October, 2015, an original and one (1) true and correct copy of the foregoing **PETITION TO INTERVENE OF THREE PEAKS POWER, LLC** were hand-delivered to:

Gary L. Widerburg
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov

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

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