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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power for Approval of Purchase and Transfer Agreement and Power Supply Agreement with Navajo Tribal Utility Authority and Amendment of Certificate of Public Convenience and Necessity	Docket No. 15-035-84  <b>ROCKY MOUNTAIN POWER'S OPPOSITION TO PETITION TO INTERVENE OF DANIEL SCOTT ZERULL AND RAP CATCHER LLC</b>
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PacifiCorp doing business as Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), pursuant to Utah Admin. Code R746-100-3 and R746-100-4, hereby opposes the petition to intervene (“Petition”) filed by Daniel Scott Zerull and Rap Catcher LLC (collectively “Rap Catcher”) in this matter on May 10, 2016.

There are two grounds for the Company’s opposition. First, the Petition was filed over two weeks beyond the deadline set in the Commission’s Scheduling Order, Directive to Stipulate to Date for Technical Conference, and Notices of Hearing and Public Witness Hearing (“Scheduling

Order”) entered in this docket on January 12, 2016, and only nine days prior to the hearing. Second, the Petition fails to state any facts demonstrating that Rap Catcher’s legal rights or interests are substantially affected by this proceeding or to state the relief sought from the Commission as required by Utah Code Ann. § 63G-4-207(1)(c) and (d). Accordingly, the Commission would be unable to make the findings required by Utah Code Ann. § 63G-4-207(2) to grant a petition to intervene.

For the foregoing reasons, the Company requests that the Petition be denied.

DATED: May 12, 2016.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R. Jeff Richards", is written over a horizontal line.

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Rocky Mountain Power

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## CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing **ROCKY MOUNTAIN POWER'S OPPOSITION TO PETITION TO INTERVENE OF DANIEL SCOTT ZERULL AND RAP CATCHER LLC** to be served upon the following by email on May 12, 2016:

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