

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

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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**In the Matter of:** The Utah Public Service Commission Exercising Jurisdiction Over Schedule 38 and, as Adopted, PacifiCorp's OATT Part IV

Docket No. 15-2582-01  
Ellis-Hall Consultants, LLC's  
Petition to Intervene

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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. On May 29, 2015, Sage Grouse Energy Project, LLC ("Sage Grouse") filed *Sage Grouse Energy Project, LLC's Request for Agency Action in the Matter of the Utah Public Service Commission Exercising Jurisdiction Over Schedule 38 and, as Adopted, PacifiCorp's OATT Part IV* (the "Petition") with the Commission.

2. Sage Grouse and the Commission have specifically served Ellis-Hall in this matter.

3. Furthermore, as quoted in Sage Grouse's Petition, the Commission's comment that it did not have jurisdiction over any part of PacifiCorp's OATT relates to Ellis-Hall.

4. As such, Ellis-Hall has a unique and direct interest in these proceedings that will not be adequately represented by any other party.

5. Ellis-Hall has not yet fully determined the specific positions it will take or the relief that it will seek.

6. Nevertheless, Ellis-Hall seeks to intervene for purposes of protecting its interests as they arise.

7. 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.

8. 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](mailto: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 8th day of June 2015.

Respectfully submitted,

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

## CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2015, an original and one (1) true and correct copy of the foregoing **Ellis-Hall Consultants, LLC's Petition to Intervene** 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

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

Utah Public Service Commission:            [psc@utah.gov](mailto:psc@utah.gov)

Rocky Mountain Power:  
    Jeff Richards                            [jeff.richards@pacificcorp.com](mailto:jeff.richards@pacificcorp.com)  
    Yvonne Hogle                           [yvonne.hogle@pacificcorp.com](mailto:yvonne.hogle@pacificcorp.com)  
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Division of Public Utilities:  
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Blue Mountain Power Partners, LLC  
    Michael Cutbirth                     [mcutbirth@champlinwind.com](mailto:mcutbirth@champlinwind.com)

Sage Grouse Energy Project, LLC  
    Michelle McDaniels                 [sage.grouse@hotmail.com](mailto:sage.grouse@hotmail.com)

Latigo Wind Park, LLC  
    Christine Mikell                      [christine@wasatchwind.com](mailto:christine@wasatchwind.com)

and a true and correct copy was mailed via United States Postal Service to:

Stephen & Bonnie Meyer, Trustee  
381 South 300 East  
Blanding, Utah 84511

/s/ Tony Hall

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Tony Hall  
Ellis-Hall Consultants, LLC – Member