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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Thayn Hydro LLC	Docket No. 16-035-04 PETITION TO INTERVENE OF THAYN HYDRO, L.L.C.
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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Thayn Hydro, L.L.C. (“Petitioner”), hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is the owner and operator of the hydroelectric power generation project and the Seller under the Power Purchase Agreement filed for approval in this docket.
2. The legal rights and interests of Petitioner will be substantially affected by this proceeding.
3. Petitioner seeks to intervene in support of Rocky Mountain Power’s Application for Approval of the Power Purchase Agreement, and for the purpose of protecting its interests as they may appear.
4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.
5. Petitioner’s interests are not adequately represented by another party in this

proceeding.

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

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WHEREFORE, the Thayn Hydro, L.L.C. requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 9th day of February, 2016.

Respectfully Submitted,
SMITH HARTVIGSEN, PLLC

 /s/ Adam S. Long
Adam S. Long
Attorney for Thayn Hydro, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 9th day of February, 2016 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)
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Office of Consumer Services

/s/ Adam S. Long