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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Implement the Programs Authorized by the Sustainable Transportation and Energy Plan Act	DOCKET NO. 16-035-36 Utah Clean Energy Petition for leave to Intervene
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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Utah Clean Energy, petitions for leave to intervene in this docket. In support of this petition, Utah Clean Energy states as follows:

1. Utah Clean Energy is a state-based, non-profit public interest organization working to create healthy, thriving communities, empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on preventing wasted energy, facilitating clean energy, and creating a smart energy future for all Utahns.

2. On September 12, Rocky Mountain Power (“the company”) filed an application for approval of a number of programs designed to implement the Sustainable Transportation and Energy Plan Act (“STEP”), signed into law March 29, 2016, and codified at Utah Code Annotated § 54-20-101, *et seq.* Among the programs the company seeks to implement are an

electric vehicle incentive program, clean coal technology programs, and “innovative utility” programs. On September 26, the Commission issued a scheduling order in this docket that limited the number of initiatives currently under review (in Phase 1) of this proceeding (“Phase 1 scheduling order”).

3. The programs that comprise the Phase 1 portion of this docket are 1) a proposed line item charge (pursuant to Utah Code Ann. § 54-7-12.8(3)) and attendant tariff and accounting issues, including, among other things, demand-side management (“DSM”) cost capitalization; 2) a Gadsby power plant curtailment (pursuant to Utah Code Ann. 54-20-105(1)(e)); 3) a solar and energy storage technology program (pursuant to Utah Code Ann. § 54-20-105(1)(c)); and 4) two “clean coal technology” programs designed to reduce nitrogen oxide (“NOx”) emissions at Utah coal plants (pursuant to Utah Code Ann. § 54-20-104).

4. Programs that will be addressed in the next phase(s) of this proceeding include an electric vehicle incentive program, a substation metering program, and additional clean coal technology programs.

5. As an advocate for energy efficiency and conservation, renewable energy, and a sustainable energy future on behalf of all Utahns, Utah Clean Energy’s legal rights and interests may be substantially affected by this proceeding, which will impact the company’s energy efficiency, renewable energy (including distributed energy resources), and electric vehicle programs.

6. Utah Clean Energy has not fully determined specific positions it will take or the relief it will seek. Utah Clean Energy seeks to intervene for purposes of protecting its interests as they arise.

7. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Utah Clean Energy to intervene.

8. Utah Clean Energy's interests are not adequately represented by another party in this proceeding.

9. If Utah Clean Energy is granted leave to intervene in this proceeding, notices should be sent to the following:

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WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 4th day of October, 2016.

Respectfully submitted,
Utah Clean Energy

/s/ _____
Sophie Hayes
Attorney for Utah Clean Energy

CERTIFICATE OF SERVICE

Docket No. 16-035-36

I hereby certify that a true and correct copy of the foregoing was served by email this 4th day of October, 2016, on the following:

PacifiCorp/Rocky Mountain Power

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/s/ Sophie Hayes