

Tariff 32 for Renewable Energy Services. Interwest has also been engaged in promoting voluntary and direct acquisition market opportunities around the West, similar to those discussed in the STEP legislation and previously in Senate Bill 12 as well as implementing rules and tariffs. Interwest can provide information to the Commission related to least-cost methodologies and regulatory best practices related to development of these tariffs.

2. Interwest members have valuable pecuniary interests which may be substantially affected by this proceeding. Its members include independent power producers operating in Utah which will likely offer their renewable energy to Utah ratepayers through facilities using the proposed tariff developed in this docket. Interwest's board members include environmental organizations working in Utah and in other states to promote renewable energy market development through direct sales to commercial interests. All of these member companies and organizations promote regulatory best practices which will incentivize growth in the renewable energy markets.

3. No other party to the proceeding will advocate for or represent the interest of Interwest's independent power producer members working to develop grid-scale renewable energy while coordinating with these environmental organizations to promote renewable energy around the West. Interwest does not currently know what evidence, if any, it would present in this proceeding. Therefore, Interwest requests that its intervention be granted and it be given party status in this proceeding.

4. Interwest's petition for leave to intervene is timely filed. Interwest's participation will not affect or impede the just, orderly and prompt conduct of these proceedings. Intervention by Interwest will not unduly broaden the issues or delay the proceeding, because its interests reflect appropriate development of a tariff within the scope of the proposed tariff filed by Rocky Mountain

Power herein.

5. If the foregoing is approved, Interwest requests that all pleadings, correspondence, discovery and other documents be served on the undersigned counsel for Interwest:

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THEREFORE, Interwest requests permission to intervene in this docket.

**B. MOTION FOR PERMISSION TO BE REPRESENTED
BY OUT-OF-STATE ATTORNEY**

Pursuant to Rule R746-100-6(B) of the Rules of Practice and Procedure of the Utah Public Service Commission, Interwest moves the Commission to allow the undersigned attorney, licensed in Colorado and Wyoming, be allowed to represent it in this proceeding without associated Utah counsel. Hiring local representation by an attorney licensed in Utah would pose an unreasonable hardship and financial burden upon Interwest. Interwest has already engaged the undersigned on a regular basis to participate in regulatory proceedings, and it would be costly to engage local counsel who would have to be retained in addition to the undersigned. The undersigned represents Interwest on a regular basis related to multi-state activities, and has previously represented Interwest in Utah regulatory dockets, including Docket No. 14-035-T02 (Related to the Renewable Energy Services Tariff 32), Docket No. 13-2035-01 (Rocky Mountain Power 2013 IRP) and Docket No. 11-2035-01 (Rocky Mountain Power 2011 IRP). Interwest regularly collaborates with other regulatory counsel in Utah. As a 501(c)(6) non-profit corporation, Interwest has limited funds, which are used to meet its goals consistent with the mission for which it was formed. The purpose and scope of intervention is to file comments and/or expert testimony and to obtain

discovery. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court October 16, 2003.

THEREFORE, Interwest respectfully requests that the Commission grant its petition for leave to intervene in this proceeding and for the undersigned to be allowed to act as counsel to represent Interwest as a party to this action.

Respectfully submitted this 14th day of July, 2016.

/s/ Lisa Tormoen Hickey

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On Behalf of Interwest Energy Alliance

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 14th day of July, 2016, by delivery as follows:

By Electronic-Mail:

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/s/ Lisa Tormoen Hickey