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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s Proposed Electric Service Schedule No. 34, Renewable Energy Tariff	DOCKET NO. 16-035-T09 University of Utah Petition to Intervene
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, the University of Utah (or “University”) petitions for leave to intervene in this docket. In support of this petition, the University states as follows:

1. The University of Utah is a state institution of higher education. One of the University’s four core commitments is to sustainability in all of its endeavors, including education, research, and operations.
2. As a purchaser and consumer of renewable energy, and an advocate and model for what is possible in energy efficiency and conservation, the University’s legal rights and interests may be substantially affected by this proceeding.
3. The University has not fully determined the positions it will take or the relief it will seek. The University instead seeks to intervene for purposes of protecting its interests as they arise.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the University to intervene.

5. As a large state research institution with an extensive health sciences operation, the University uses between 35 to 50 megawatts of electricity per day. The University's interests therefore are unique and not adequately represented by another party in this proceeding.

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

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WHEREFORE, the University of Utah requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 15th day of July, 2016.

SEAN D REYES
Utah Attorney General

/s/ David C. Jones
DAVID C. JONES
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Attorneys for the University of Utah

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 15th day of July, 2016, on the following:

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