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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of PacifiCorp's 2017 Integrated Resource Plan	Docket No. 17-035-16
	<b>PETITION TO INTERVENE OF THE RENEWABLE ENERGY COALITION</b>

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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Renewable Energy Coalition (the “**Coalition**” or “**REC**”) respectfully petitions the Public Service Commission (“**Commission**”) for leave to intervene in this docket regarding PacifiCorp’s 2017 Integrated Resource Plan. In support of this petition, Coalition states as follows:

1. The Coalition was established in 2009, and is comprised of nearly forty members who own, operate or are developing over fifty small renewable energy generation qualifying facilities (“**QFs**”) in Oregon, Idaho, Montana, Washington, Utah, and Wyoming. Several types of entities are members of the Coalition, including irrigation districts, water districts, corporations, and individuals. REC’s members have power purchase agreements with many of the northwest utilities, including PacifiCorp/Rocky Mountain Power. REC actively participates in numerous regulatory proceedings and legislative processes related to renewable energy, the Public Utility Regulatory Policies Act, competitive bidding, and power markets.

2. One of the Coalition's goals is to ensure fair and reasonable contract terms and conditions, and fair avoided cost rates for QFs. Most of the REC's members operate existing projects that have been operating and selling to utilities for numerous years, but many of the members are also developing or planning to develop new projects.

3. The legal rights and interests of the Coalition and its members may be substantially affected by this proceeding.

4. The Coalition has not fully determined specific positions it will take or the relief it will seek. The Coalition seeks to intervene for purposes of protecting its interests as they arise.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the Coalition to intervene. This request is submitted in advance of that deadline for intervention of November 3, 2017 for this docket.

6. The Coalition's interests are not adequately represented by another party in this proceeding.

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

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Renewable Energy Coalition  
c/o John Lowe  
PO Box 25576  
Portland, OR 97298  
(503) 717-5375  
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WHEREFORE, the Renewable Energy Coalition requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 28<sup>th</sup> day of August, 2017.

Respectfully Submitted,  
**SMITH HARTVIGSEN, PLLC**

/s/ Adam S. Long  
J. Craig Smith  
Adam S. Long  
*Attorneys for the Renewable Energy Coalition*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on this 28<sup>th</sup> day of August, 2017 upon the following as indicated below:

Via e-mail to:

Utah Public Service Commission (psc@utah.gov)

Data Request Response Center (datarequest@pacificorp.com)  
PacifiCorp

Robert C. Lively (bob.lively@pacificorp.com)  
Rocky Mountain Power

Gary A. Dodge (gdodge@hjdllaw.com)  
Hatch, James & Dodge

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/s/ Adam S. Long