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On Behalf of Interwest Energy Alliance

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s 2017 Integrated Resource Plan)
Docket No. 17-035-16)
)

**PETITION TO INTERVENE
INTERWEST ENERGY ALLIANCE**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), the Interwest Energy Alliance (“Interwest”, or “Petitioner”) hereby submits its petition to intervene pursuant to Utah Code Ann. §63G-4-207 and Rule R746-1-108 of the Utah Administrative Code. In support, Petitioner states as follows:

1. Petitioner. Interwest Energy Alliance is a 501(c)(6) nonprofit trade association of renewable energy project developers and equipment manufacturers working with the non-governmental conservation community to promote renewable energy in Utah (and also in Wyoming, Colorado, Nevada, Arizona and New Mexico). Interwest has been actively engaged in public input processes and regulatory dockets in Wyoming and Utah related to Rocky Mountain Power’s resource planning and other proceedings to promote additional acquisitions of renewable energy.

2. Petitioner will be substantially affected. Interwest's members will be substantially affected by the proceedings and results of this docket, because the renewable energy developers generally bid into requests for proposals issued by PacifiCorp when it acquires grid-scale renewable energy resources to implement the resource plans acknowledged by this Commission. Interwest generally supports the new renewable energy acquisitions which the IRP modeling reveals to be cost-effective, because the new resources will provide low-cost, stably-priced power which will provide substantial economic benefits. Prompt action by this Commission will enable Rocky Mountain Power to tap the valuable production tax credits currently available for wind energy. Production tax credits at the 100% eligibility level are available to any type of wind project which has taken the necessary steps to qualify for the Internal Revenue Service safe harbor guidelines. Interwest will also promote increased attention to the benefits of acquiring additional grid-scale solar resources which the 2017 IRP does not contemplate in material amounts for a period of years. If the IRP is acknowledged by the Utah Commission and request(s) for proposals are issued to implement the Action Plan, Interwest's members will likely offer diverse, low-cost, stably-priced power without fuel costs from their renewable energy projects to serve Utah electricity consumers throughout the planning period.

3. No other party represents Petitioner's interests. Interwest's board members include environmental organizations working in all states served by Rocky Mountain Power to promote renewable energy market development. All of the member companies and organizations promote regulatory best practices which will incentivize growth in the renewable energy markets, which can be applied in this proceeding. No other party to the proceeding will represent the interests of Interwest's members, which include independent power producers, renewable technology manufacturers, and environmental organizations working together to promote

renewable energy in Utah and Wyoming as well as in other Intermountain states.

4. Contribution will not delay proceeding. Interwest's advocacy will assist the Commission by providing market information which may not be otherwise available. Interwest's participation will not affect or impede the just, orderly and prompt conduct of these proceedings. Therefore, Interwest requests that its intervention be granted and that it be given party status so that its attorney(s) can attend the hearing(s) and submit evidence as may be allowed herein.

5. Notice. Notice is hereby requested for all pleadings and discovery to the following:

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Respectfully submitted this 8th day of September, 2017.

/s/ Mitch M. Longson
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On Behalf of Interwest Energy Alliance

Petitioner's address (copies of notices not required):

Interwest Energy Alliance

Sarah Cottrell Propst

Executive Director

P.O. Box 8526

Santa Fe, NM 87504-8526

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served on the following, by email unless noted otherwise, on this 8th day of September, 2017:

psc@utah.gov, Utah Public Service Commission

<p>ROCKY MOUNTAIN POWER</p> <p>Jeff Richards (Robert.richards@pacificorp.com) Robert C. Lively (bob.lively@pacificorp.com) Yvonne Hogle (Yvonne.hogle@pacificorp.com) Data Request Response Center (datarequest@pacificorp.com)</p>	<p>DIVISION OF PUBLIC UTILITIES Erika Tedder (etedder@utah.gov)</p> <p>ASSISTANT UTAH ATTORNEYS GENERAL Patricia Schmid (pschmid@agutah.gov) Justin Jetter (jjetter@agutah.gov) Chris Parker (chrisparker@utah.gov) Robert Moore (rmoore@agutah.gov) Steven Snarr (stevensnarr@agutah.gov)</p>
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/s/ Mitch M. Longson _____