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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of PacifiCorp's 2017 Integrated Resource Plan	<b>Docket No. 17-035-16</b> <b>NATIONAL PARKS CONSERVATION ASSOCIATION PETITION FOR INTERVENTION</b>
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Pursuant to Commission Rule R746-1-108 and Utah Code § 63G-4-207, National Parks Conservation Association (“NPCA”) petitions for intervention in the above-captioned docket.

The following facts support NPCA’s intervention in this proceeding:

1. NPCA is a non-profit conservation organization whose mission is to strengthen and protect America’s national parks for present and future generations. NPCA has more than 1.4 million members and supporters across the nation, including 2,828 paying members and 10,307 members and supporters in Utah. NPCA has a Salt Lake City office that focuses on protecting and preserving Utah’s numerous national parks, and many of its Utah members are PacifiCorp/Rocky Mountain Power customers.
2. NPCA has long worked to reduce air pollution impacting Utah’s renowned national parks. Air pollution from PacifiCorp’s coal-fired power plants mars the scenic views at national parks in Utah and other states, and impairs the health and recreational experience of the millions of people who visit these parks every year. To reduce this harmful air pollution, NPCA has engaged in numerous U.S. Environmental Protection Agency (“EPA”) rulemakings and federal

court litigation to ensure PacifiCorp's coal-fired power plants fully comply with the Clean Air Act's regional haze requirements. NPCA and its members also have a strong interest in the development of appropriately sited clean energy resources that will reduce the air pollution impacts of meeting our nation's energy needs.

3. NPCA has a strong interest in PacifiCorp's 2017 Integrated Resource Plan ("IRP") because it will influence the mix of resources that the utility uses to provide service in Utah and other states, including decisions about the future of PacifiCorp's coal-fired generating units. Thus, NPCA's long-standing efforts to reduce air pollution from these coal plants may be substantially impacted by the outcome of this proceeding. In addition, NPCA seeks to ensure the IRP accurately represents PacifiCorp's regional haze obligations. The Commission and stakeholders will be unable to make a rational and well-reasoned analysis of PacifiCorp's future resource procurements and retirements without an accurate accounting for how PacifiCorp's coal plants will be required to reduce their air pollution under the Clean Air Act's regional haze program.

4. NPCA's interests are not adequately represented by any other party in this proceeding.

5. NPCA's intervention in this docket will not unduly broaden the issues or delay this proceeding. Moreover, NPCA will meaningfully contribute to the resolution of this proceeding through its expertise on the Clean Air Act's regional haze program and PacifiCorp's legal obligations under that program.

6. NPCA has not yet fully determined the specific positions it will take in this proceeding, the evidence it will present, or the relief it will seek. While NPCA is submitting initial comments on the IRP along with this petition, review of the other comments that are filed will be necessary before NPCA can determine what, if any, positions it will take in reply comments.

7. NPCA's petition for intervention is timely filed.
8. NPCA requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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9. Stephanie Kodish is an attorney in good standing and licensed to practice law in the District of Columbia and Massachusetts. Ms. Kodish is a full-time employee of NPCA and is therefore authorized to represent NPCA's interests in this proceeding pursuant to Rule R746-100-6(b).

WHEREFORE, NPCA respectfully requests the Commission grant its petition for intervention in this proceeding.

DATED: October 24, 2017.

Respectfully submitted,



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**STATE OF UTAH**

**Public Service Commission**

In the Matter of PacifiCorp's 2017  
Integrated Resource Plan

Docket No. 17-035-16

**CERTIFICATE OF SERVICE**

I CERTIFY that on October 24, 2017, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

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Dated this 24<sup>th</sup> day of October, 2017 at Asheville, NC.

*/s/ Ulla Reeves*

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