

Integrated Resource Plans approved by this Commission. This docket is opened for review and approval of the RFP for acquisition of hundreds of megawatts of new wind resources, to be located in Wyoming. Interwest supports these acquisitions because the new resources will provide low-cost, stably-priced power which will help reduce overall greenhouse gas emissions within the Rocky Mountain Power service area. 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 safe harbor, developed under various business models.

2. Purpose of Intervention. Interwest is interested in promoting fair and transparent requests for proposals and bid review processes with sufficient competitive protections to encourage robust response and to enable a mix of business models to compete. Utah's regulatory backdrop has helped develop a strong competitive environment and Interwest's intervention will help identify areas where the request for proposals and bid review process may reduce competition and tilt the playing field, potentially increasing prices and inhibiting efficiencies in the renewable energy market acquisitions. Since Rocky Mountain Power will be investing millions in renewable energy to serve Utah electricity consumers for years to come, it is important that the most efficient resources be acquired to meet its clean energy goals. Interwest's board members include environmental organizations working in Utah and in other states served by Rocky Mountain Power to promote renewable energy market development. All of these member companies and organizations promote regulatory best practices which will incentivize growth in the renewable energy markets, which can be applied in this proceeding.

2. No other party represents Petitioner's interests. No other party to the proceeding will advocate for or represent the interest 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. Interwest will be submitting comments filed with this Petition with specific recommendations.

3. 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 comments as may be allowed herein.

4. Timeliness. Interwest's petition for leave to intervene is timely filed. Interwest will also be submitting a separate motion for admission of counsel *pro hac vice*.

Respectfully submitted this 3rd day of August, 2017.



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served by email this 3rd day of August, 2017, on the following:

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Utah Public Service Commission

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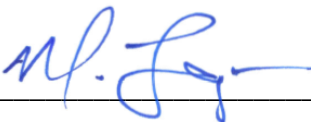
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