

Elizabeth M. Brereton (#14950)  
SNELL & WILMER L.L.P.  
15 West South Temple, Suite 1200  
Salt Lake City, UT 84101  
Telephone: (801)257-1961  
Facsimile: 801-257-1800  
Email: lbrereton@swlaw.com

*Counsel for Enyo Energy Renewables*

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Wind Resources	Docket No. 17-035-23
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**PETITION TO INTERVENE OF ENYO RENEWABLE ENERGY**

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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, the undersigned counsel hereby submits this Petition to Intervene in Docket No. 17-035-23 on behalf of Enyo Renewable Energy (“Enyo Energy” or “Petitioner”). In support hereof, Petitioner states as follows:

1. Enyo Energy is a utility scale solar and wind energy development company based in Salt Lake City, Utah. Enyo currently has renewable energy projects in Utah and Wyoming that, in aggregate, generate 140 MW of clean, renewable energy. Enyo Energy is in the process of developing several renewable energy projects in Wyoming, Utah and Colorado.

2. Enyo Energy seeks intervention because its legal rights and interests will be substantially affected by this proceeding and Enyo Energy will not be adequately represented by any other party. As an independent power producer with wind and solar power projects sited in Utah and Wyoming, Enyo Energy is interested in ensuring that any solicitation process approved by the Utah Public Service Commission is transparent, non-discriminatory, and considers a range

of projects, including projects sited in Utah. Enyo Energy seeks to intervene to protect its interests as an independent power producer and to address issues raised in PacifiCorp's hurried application to the Commission. More Specifically, Enyo Energy seeks to address the matter of independent power producer market participation given certain assumptions for benchmark resources and the scope of the solicitation process.

6. Enyo Energy has not fully determined specific positions it will take or the relief it will seek. Enyo Energy reserves the right to present briefing, testimony and evidence, examine witnesses and otherwise participate in this docket based upon pleadings, testimony, exhibits and evidence presented by any party to this proceeding.

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

7. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

Christine Mikell  
Enyo Renewable Energy  
3434 East, Bengal Blvd. #180  
Salt Lake City, Utah 84212

*Christine@enyo-energy.com*

Elizabeth M. Brereton  
Snell & Wilmer L.L.P.  
15 W. South Temple, Suite 1200  
Salt Lake City, Utah 84101

*lbrereton@swlaw.com*

Wherefore, for the reasons set forth above, Enyo Energy requests that the Public Service Commission of Utah grant this timely Petition to Intervene as a party in this proceeding.

Dated this 7<sup>th</sup> day of September, 2017.

SNELL AND WILMER L.L.P.

*/s/ Elizabeth M. Brereton*

Elizabeth M. Brereton, Esq.

*Counsel for Enyo Renewable Energy*

**CERTIFICATE OF SERVICE**

I CERTIFY that on September 7, 2017, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Electronic-Mail:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
PacifiCorp

Robert C. Lively ([bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com))  
Yvonne Hogle ([yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com))  
Jeff Richards ([robert.richards@pacificorp.com](mailto:robert.richards@pacificorp.com))  
Rocky Mountain Power

Sarah K. Link ([sarah.kamman@pacificorp.com](mailto:sarah.kamman@pacificorp.com))  
Karen J. Kruse ([karen.kruse@pacificorp.com](mailto:karen.kruse@pacificorp.com))  
Pacific Power

Gary A. Dodge ([gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com))  
Phillip J. Russell ([prussell@hjdllaw.com](mailto:prussell@hjdllaw.com))  
Hatch, James & Dodge, P.C.

Patricia Schmid ([pschmid@agutah.gov](mailto:pschmid@agutah.gov))  
Justin Jetter ([jjetter@agutah.gov](mailto:jjetter@agutah.gov))  
Robert Moore ([rmoore@agutah.gov](mailto:rmoore@agutah.gov))  
Steven Snarr ([stevensnarr@agutah.gov](mailto:stevensnarr@agutah.gov))  
Assistant Utah Attorneys General

Erika Tedder ([etedder@utah.gov](mailto:etedder@utah.gov))  
Division of Public Utilities

By Hand Delivery:

Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, Utah 84111

*/s/ Mindi Mordue*  
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Paralegal