WILLIAM J. EVANS (5276) CHAD C. BAKER (14541) PARSONS BEHLE & LATIMER One Utah Center 201 South Main Street, Suite 1800 Post Office Box 45898 Salt Lake City, UT 84145-0898

Telephone: (801) 532-1234 Facsimile: (801) 536-6111

Attorneys for Tesoro Refining and Marketing Company LLC and Kennecott Utah Copper LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp d/b/a Rocky Mountain Power's Request for a Declaratory Ruling regarding Allocation of Interconnection Costs under Public Utility Regulatory Policies Act. Docket No. 17-035-25

Joint Petition to Intervene by Kennecott Utah Copper LLC and Tesoro Refining and Marketing Company LLC

In accordance with Utah Code §§ 63G-4-207 and 63G-4-503 and Rule R746-1-108 of the Utah Public Service Commission ("Commission"), Kennecott Utah Copper LLC ("Kennecott" or "RTKC") and Tesoro Refining and Marketing Company LLC ("Tesoro") (referred to, for convenience only, as the "Joint Industrial Petitioners") petition the Commission for leave to intervene in Docket No. 17-035-25 ("Docket") for the sole purpose of filing comments encouraging the Commission in this Docket to not alter, change, or otherwise disrupt the interconnection and associated relationships between RMP and existing industrial customers that receive retail electric service from RMP and that also own, operate, and consume energy produced by QFs in connection with their industrial operations, and request that the Commission

issue an order allowing the Joint Industrial Petitioners to participate in this matter as requested in this Joint Petition to Intervene.

In support of its Petition to Intervene, the Joint Industrial Petitioners state as follows:

- 1. On 1 May 2017, PacifiCorp, doing business in Utah as Rocky Mountain Power ("RMP" or "Company")), filed a request for declaratory ruling regarding allocation of interconnection costs under the Public Utility Regulatory Policies Act.
- 2. Each of the Joint Industrial Petitioners owns, operates and consumes energy produced by qualified facilities (QFs) in connection with their respective industrial operations. and each also receives retail electric service from RMP.
- 3. Joint Industrial Petitioners have joined together for the purposes of limited intervention in this docket to have their common interests associated with ownership, operation and consumption of QF energy as part of their industrial operations and retail electric service represented. The interests of Tesoro and Kennecott will not be represented adequately by any other party to this proceeding.
- 4. Joint Industrial Petitioners each have a direct, immediate, and substantial interest in this proceeding as customers of RMP and owners and operators of QFs.
- 5. If the Joint Industrial Petitioners are granted leave to intervene in this proceeding, they request that service of all pleadings, notices, and other filings in this docket be made to:

William J. Evans Chad Baker Parsons Behle & Latimer 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 bevans@parsonsbehle.com cbaker@parsonsbehle.com 6. The Joint Industrial Petitioners' intervention in this docket will not materially

impair the interests of justice and the orderly and prompt conduct of this proceeding.

7. The Joint Industrial Petitioners seek to participate solely to file comments

encouraging the Commission in this Docket to not alter, change, or otherwise disrupt the

interconnection and associated relationships between RMP and existing industrial customers that

receive retail electric service from RMP and that also own, operate, and consume energy

produced by QFs in connection with their industrial operations. Joint Industrial Petitioners also

request relief to the extent necessary to protect their interests.

WHEREFORE, the Joint Industrial Petitioners respectfully request that the Commission

enter an Order granting Kennecott and Tesoro permission to intervene in this Docket and to

participate to the full extent requested herein and allowed by the law.

DATED this 1st day of June, 2017

/s/ Chad Baker

WILLIAM J. EVANS

CHAD C. BAKER

PARSONS BEHLE & LATIMER

Attorneys for UIEC, an Intervention Group

3

CERTIFICATE OF SERVICE

(Docket No. 17-035-25)

I hereby certify that on this 1st day of June 2017, I caused to be e-mailed, a true and correct copy of the foregoing JOINT PETITION TO INTERVENE BY KENNECOTT UTAH COPPER LLC and TESORO REFINING AND MAREKTING COMPANY LLC to:

Patricia Schmid
Justin Jetter
Robert Moore
ASSISTANT ATTORNEYS GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov
jjetter@utah.gov
rmoore@utah.gov

Michele Beck
Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov

Chris Parker
DIVISION OF PUBLIC UTILITIES
500 Heber Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
chrisparker@utah.gov

R. Jeff Richards
Yvonne R. Hogle
Bob Lively
ROCKY MOUNTAIN POWER
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
robert.richards@pacificorp.com
yvonne.hogle@pacificorp.com
bob.lively@pacificorp.com

Sarah K. Link Karen J. Kruse PacifiCorp d/b/a Pacific Power 825 NE Multnomah St., Suite 2000 Portland, Oregon 97232 Sarah.Kamman@pacificorp.com Karen.Kruse@pacificorp.com

Paul Shakespear Elizabeth M. Brereton SNELL & WILMER L.L.P. 15 West South Temple, Suite 1200 Salt Lake City, UT 84101 Telephone: 801-257-1541 Facsimile: 801-257-1800 pshakespear@swlaw.com lbrereton@swlaw.com

Christine Mikell Enyo Renewable Energy, L.L.C. 3434 E. Bengal Blvd. #180 Salt Lake City, Utah, 84121 Telephone: 801-455-1045 christine@enyo-energy.com

/s/ Joy Prout