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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power	Docket No. 17-035-36
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PETITION TO INTERVENE OF ARIZONA PUBLIC SERVICE COMPANY

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. 17-035-36 on behalf of Arizona Public Service Company ("APS" or "Petitioner"). In support hereof, Petitioner states as follows:

1. APS, a wholly-owned subsidiary of Pinnacle West Capital Corporation, is a vertically integrated public utility engaged in the business of generating, transmitting, and distributing electricity throughout the State of Arizona. APS owns approximately 7,706 MW of generation capacity and provides open access transmission service pursuant to its Open Access Transmission Tariff ("OATT") approved by the Federal Energy Regulatory Commission ("FERC").

2. APS and PacifiCorp (d.b.a. Rocky Mountain Power) are parties to FERC jurisdictional agreements, governing mutual rights and obligations tied to transmission service

over PacifiCorp's transmission system. One of these agreements allocates certain firm transmission rights to PacifiCorp and Petitioner on the Sigurd-Glen Canyon 230 kV transmission line ("Sigurd-GC Line").

3. The relief requested by Glen Canyon Solar A and B ("GC Solar") in this proceeding could compel PacifiCorp to utilize its existing transmission rights on the Sigurd-GC Line to facilitate interconnection of and provide transmission service to its projects.

4. APS transmission rights on the Sigurd-GC line will be impacted by any order issued by the Utah Public Service Commission ("Commission") that prevents PacifiCorp from fully performing its obligations to APS under FERC-jurisdictional agreements.

5. APS, therefore, seeks intervention because its legal rights and interests will be substantially affected by this proceeding and APS will not be adequately represented by any other party.

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

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

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

Dated this 1st day of September, 2017.

SNELL AND WILMER L.L.P.

/s/ Elizabeth M. Brereton _____

Elizabeth M. Brereton, Esq.

Counsel for Arizona Public Service Company

CERTIFICATE OF SERVICE

I CERTIFY that on September 1, 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)
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/s/ Mindi Mordue

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