



**2. Petitioner will be substantially affected.** Interwest’s members will be substantially affected by the proceedings and results of this docket, because its members include equipment manufacturers which provide necessary equipment and engineering, procurement, and construction services for utilities as part of utility wind procurements. This docket is opened for review of an application filed by Rocky Mountain Power for nontraditional ratemaking related to its decision to upgrade or “repower” existing wind resources, including (a) requesting a finding of prudence; (b) approval of the utility’s continued recovery of the replaced wind plant equipment; and (c) approval of the utility’s proposed ratemaking treatment. The utility’s modeling used to develop the 2017 Integrated Resource Plan reflected the repowering to be a low-cost resource, included in the preferred portfolio. The utility proposes to upgrade or “repower” its wind facilities because the upgrades provide net benefits to customers by increasing energy production, reducing operating costs, and requalifying the utility’s existing wind resources for federal production tax credits (“PTCs”), which otherwise would expire 10 years after a facility’s original commercial operation date. Interwest supports the repowering because the upgraded wind equipment will provide higher capacity factors and additional low-cost power which will provide substantial economic benefits to Wyoming electricity consumers. Specifically, the new turbines will sweep a wider area, providing more efficient power production. The innovative technologies provide for greater control of power quality and voltage, allowing the utility to more easily integrate the energy from the wind facilities and into the transmission system and to support the reliability of the grid. Prompt action by this Commission will enable Rocky Mountain Power to tap the valuable production tax credits currently available for wind energy.

**3. No other party represents Petitioner’s interests.** Interwest’s board members

include environmental organizations working in all states served by Rocky Mountain Power to promote renewable energy market development. All of the member companies and organizations promote regulatory best practices which will incentivize growth in the renewable energy markets, which can be applied in this proceeding. One or more Interwest members may provide equipment or construction services for these repowering projects. 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 Wyoming and Utah as well as in other Intermountain states. Interwest does not know the scope of its testimony at this time.

**4. Contribution will not delay proceeding.** Interwest's advocacy will assist the Commission by providing information about the markets and the production tax credits 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.

**5. Timeliness.** Interwest's petition for leave to intervene is timely filed.

**6. Notice.** Interwest requests that all pleadings and discovery be sent to the following:

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Respectfully submitted this 22nd day of August, 2017.

/s/ Mitch M. Longson

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**On Behalf of Interwest Energy Alliance**

Petitioner's address (copies of notices not required):

Interwest Energy Alliance  
Sarah Cottrell Propst  
Executive Director  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served on the following, by email unless noted otherwise, on this 22nd day of August, 2017:

[psc@utah.gov](mailto:psc@utah.gov), Utah Public Service Commission

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/s/ Mitch M. Longson \_\_\_\_\_