Sophie Hayes (12546) Utah Clean Energy 1014 2nd Ave. Salt Lake City, UT 84103 801-363-4046 sophie@utahcleanenergy.org *Attorney for Utah Clean Energy*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

	D оскет No. 17-035-39
In the Matter of the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision to Repower Wind Facilities	Utah Clean Energy Petition for leave to Intervene

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Utah Clean Energy petitions for leave to intervene in this docket. In support of this petition, Utah Clean Energy states as follows:

1. Utah Clean Energy is a state-based, non-profit public interest organization working to create healthy, thriving communities, empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on preventing wasted energy, facilitating clean energy, and creating a smart energy future for all Utahns.

2. As an advocate for energy efficiency and conservation, renewable energy, and a sustainable energy future on behalf of all Utahns, Utah Clean Energy's legal rights and interests may be substantially affected by this proceeding, which impact PacifiCorp's resource acquisition strategies over the near and long terms.

3. Utah Clean Energy has not fully determined specific positions it will take or the relief it will seek. Utah Clean Energy seeks to intervene for purposes of protecting its interests as they arise.

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

5. If Utah Clean Energy is granted leave to intervene in this proceeding, notices should be sent to the following:

Sophie Hayes Kate Bowman Utah Clean Energy 1014 2nd Avenue Salt Lake City, UT 84111 801-363-4046 <u>sophie@utahcleanenergy.org</u> kate@utahcleanenergy.org

WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect

its interests as they may arise.

DATED this 30th day of August, 2017.

Respectfully submitted, Utah Clean Energy

Sophie Hayes Attorney for Utah Clean Energy

CERTIFICATE OF SERVICE

Docket No. 17-035-39

I hereby certify that a true and correct copy of the foregoing was served by email this 30th day of August, 2017, on the following:

PacifiCorp/Rocky Mountain Power

Yvonne Hogle Daniel Solander Bob Lively Data Request Response Center

Office of Consumer Services

Robert Moore Steven Snarr Michele Beck Bela Vastag

Utah Division of Public Utilities

Patricia Schmid Justin Jetter Chris Parker Artie Powell DPU Data Request Center

Utah Association of Energy Users

Gary Dodge Kevin Higgins Neal Townsend

Utah Clean Energy Sophie Hayes

Kate Bowman

Interwest Energy Alliance

Lisa Tormoen Hickey Mitch M. Longson Sarah Cottrell Propst

Nucor Steel-Utah

Peter J. Mattheis Eric J. Lacey Jeremy R. Cook yvonne.hogle@pacificorp.com daniel.solander@pacificorp.com bob.lively@pacificorp.com datarequest@pacificorp.com

rmoore@agutah.gov stevensnarr@agutah.gov mbeck@utah.gov bvastag@utah.gov

pschmid@agutah.gov jjetter@agutah.gov chrisparker@utah.gov wpowell@utah.gov dpudatarequest@utah.gov

gdodge@hjdlaw.com khiggins@energystrat.com ntownsend@energystrat.com

sophie@utahcleanenergy.org kate@utahcleanenergy.org

lisahickey@newlawgroup.com mlongson@mc2b.com propst@interwest.org

pjm@smxblaw.com ejl@smxblaw.com jcook@cohnekinghorn.com

/s/ Sophie Hayes