

Jennifer E. Gardner (15503)
Western Resource Advocates
150 South 600 East, Suite 2A
Salt Lake City UT 84102
801-413-7355
jennifer.gardner@westernresources.org

Attorney for Western Resource Advocates

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF RESOURCE DECISION TO REPOWER WIND FACILITIES	Docket No. 17-035-39 PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES
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Pursuant to Utah Code § 63G-4-207, Utah Administrative Code Rule 746-1-108 and the July 13 Scheduling Order of the Utah Public Service Commission (“Commission”), Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a non-profit conservation organization dedicated to protecting the land, air and water of the West. WRA’s Clean Energy Program develops and implements policies to reduce environmental impacts of the electric power industry in the Interior West by advocating for a western electric system that provides affordable and reliable energy, reduces economic risks, and protects the environment through the expanded use of energy efficiency, renewable energy resources, and other clean energy technologies. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are PacifiCorp/Rocky Mountain Power (“Company”) ratepayers. WRA has participated in electric

utility proceedings for over 20 years and has been granted intervenor status in multiple Utah Commission dockets.

2. The Company is requesting approval to upgrade or “repower” certain existing wind resources at a cost of approximately \$1.13 billion in order to take advantage of the federal production tax credit and to increase energy output at these facilities by an average of 19 percent. WRA’s interest is directly related to the Company’s repowering activities planned in this proceeding. To enable WRA to effectively analyze and assess the Company’s plans for wind repowering, and to provide intervenor expertise and input, WRA requests that its intervention be granted and that it be given party status in this proceeding.

3. Intervention by WRA will not unduly broaden the issues or delay the proceeding. WRA’s petition for leave to intervene is timely filed. WRA does not currently know what evidence or argument, if any, it would present in this proceeding.

4. WRA requests that all pleadings, correspondence, discovery and other documents be served on the following:

Jennifer E. Gardner
Western Resource Advocates
150 South 600 East, Suite 2A
Salt Lake City UT 84102
801-413-7355
jennifer.gardner@westernresources.org

Nancy Kelly
Western Resource Advocates
9463 N. Swallow Rd.
Pocatello, ID 83201
208-234-0636
nkelly@westernresources.org

5. WRA also requests that the following name be added to the electronic service list for this docket: Penny Anderson (penny.anderson@westernresources.org).

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Dated this 6th day of September 2017.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES



Jennifer E. Gardner (15503)
Western Resource Advocates
150 South 600 East, Suite 2A
Salt Lake City UT 84102
801-413-7355
jennifer.gardner@westernresources.org

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 6th day of September 2017 on the following:

Rocky Mountain Power/PacifiCorp

Jeff Richards robert.richards@pacificorp.com
Yvonne Hogle yvonne.hogle@pacificorp.com
Jeff Larsen jeff.larsen@pacificorp.com
Bob Lively bob.lively@pacificorp.com
Katherine McDowell katherine@mrg-law.com
datarequest@pacificorp.com

Office of Consumer Services

Cheryl Murray cmurray@utah.gov
Michele Beck mbeck@utah.gov

Utah Division of Public Utilities

Patricia Schmid pschmid@agutah.gov
Justin Jetter jjetter@agutah.gov
Chris Parker chrisparker@utah.gov
Artie Powell wpowell@utah.gov
Rex Olsen rolsen@utah.gov
Robert Moore rmoore@utah.gov
Erika Tedder etedder@utah.gov

Interwest Energy Alliance

Mitch Longson mlongson@mc2b.com
Lisa Tormoen Hickey [lisahickey@newLawgroup.com](mailto:lisahickey@newlawgroup.com)

Nucor

Peter J. Mattheis pjm@smxblaw.com
Eric J. Lacey ejl@smxblaw.com
Jeremy R. Cook jcook@cohnekinghorn.com

Utah Association of Energy Users

Gary Dodge gdodge@hjdLaw.com
Phillip Russell prussell@hjdLaw.com

Utah Clean Energy

Sophie Hayes sophie@utahcleanenergy.org
Kate Bowman kate@utahcleanenergy.org

Western Resource Advocates
Jennifer Gardner
Nancy Kelly

jennifer.gardner@westernresources.org
nkelly@westernresources.org

Penny Anderson