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Counsel for the Interwest Energy Alliance

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE REQUEST OF)
ROCKY MOUNTAIN POWER FOR APPROVAL OF) Docket No.17- 035-40
RESOURCE DECISION TO CONSTRUCT WIND)
RESOURCE AND TRANSMISSION FACILITIES)

PETITION TO INTERVENE OF THE INTERWEST ENERGY ALLIANCE

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), the Interwest Energy Alliance (“Interwest”, or “Petitioner”) hereby submits its petition to intervene pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108 of the Utah Administrative Code. In support, Petitioner states as follows:

1. Petitioner. Interwest Energy Alliance is a 501(c)(6) nonprofit trade association of renewable energy project developers and equipment manufacturers working with the non-governmental conservation community to promote renewable energy in Utah (and also in Wyoming, Colorado, Nevada, Arizona and New Mexico). Interwest has been actively engaged in public input processes and regulatory dockets in Wyoming and Utah related to Rocky Mountain Power’s resource planning and other proceedings to promote additional acquisitions of renewable energy.

2. Petitioner will be substantially affected. Interwest’s members will be substantially affected by the proceedings and results of this docket, because the renewable

energy developers generally bid into requests for proposals which may be issued by PacifiCorp when it acquires grid - scale renewable energy resources to implement the resource plans approved by this Commission. This docket was opened for review and approval of the certificates of public convenience and necessity and nontraditional ratemaking for procurement of hundreds of megawatts of new wind resources and transmission facilities to serve PacifiCorp's customers, and Interwest members are likely to submit proposals for consideration as part of this new wind procurement. Interwest generally supports these acquisitions because the new resources will provide low-cost, stably-priced power which will provide substantial economic benefits. Prompt action by this Commission will enable Rocky Mountain Power to tap the valuable production tax credits currently available for wind energy. Production tax credits at the 100% eligibility level are available to any type of wind project which has taken the necessary steps to qualify for the Internal Revenue Service safe harbor guidelines. Interwest's advocacy will also include acquisition through fair and transparent requests for proposals and bid review processes with sufficient competitive protections to encourage robust response and to enable a mix of business models to compete. Since Rocky Mountain Power will be investing millions in renewable energy to serve its electricity consumers for years to come, it is important that the most efficient resources be acquired to meet its clean energy goals.

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. 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 Utah and Wyoming 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 market information 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 evidence as may be allowed herein.

5. Notice. Notice is hereby requested for all pleadings and discovery to the following:

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Respectfully submitted this 15th 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
P.O. Box 8526
Santa Fe, NM 87504-8526

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 15th day of August, 2017:

psc@utah.gov, Utah Public Service Commission

<p>ROCKY MOUNTAIN POWER</p> <p>Jeff Richards (Robert.richards@pacificorp.com) Robert C. Lively (bob.lively@pacificorp.com) Yvonne Hogle (Yvonne.hogle@pacificorp.com) Data Request Response Center (datarequest@pacificorp.com)</p>	<p>DIVISION OF PUBLIC UTILITIES Erika Tedder (etedder@utah.gov)</p> <p>ASSISTANT UTAH ATTORNEYS GENERAL Patricia Schmid (pschmid@agutah.gov) Justin Jetter (jjetter@agutah.gov) Chris Parker (chrisparker@utah.gov) Robert Moore (rmoore@agutah.gov) Steven Snarr (stevensnarr@agutah.gov)</p>	<p>OFFICE OF CONSUMER SERVICES</p> <p>Office of Consumer Services (by U.S. Mail) 160 East 300 South, 2nd Floor Salt Lake City, Utah 84111</p> <p>Rex Olsen (rolsen@utah.gov) Michele Beck (mbeck@utah.gov) Cheryl Murray (cmurray@utah.gov) Bela Vastag (bvastag@utah.gov)</p>
<p>UTAH ASSOCIATION OF ENERGY USERS</p> <p>Gary Dodge (gdodge@hjdllaw.com) Phillip J. Russell (prussell@hjdllaw.com)</p>	<p>NUCOR STEEL-UTAH Jeremy R. Cook Cohne Kinghorn 111 East Broadway, 11th Floor Salt Lake City, UT 84111 jcook@cohnekinghorn.com</p> <p>Peter J. Mattheis Eric J. Lacey Stone Mattheis Xenopoulos & Brew, P.C. 1025 Thomas Jefferson Street, N.W. 800 West Tower Washington, DC 20007 pjm@smxblaw.com ejl@smxblaw.com</p>	

/s/ Mitch M. Longson _____