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*Representing Vote Solar*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity

**Docket No. 17-035-61**

**Vote Solar Petition to Intervene in Phase 1 and Phase 2 of this Docket**

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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Vote Solar petitions for leave to intervene in Phase 1 and Phase 2 of this docket. In support of this petition, Vote Solar states as follows:

1. On December 1, 2017, Rocky Mountain Power submitted an Application to the Commission to Establish Export Credits for Customer Generated Electricity.
2. On December 12, 2017, the Commission issued a Scheduling Order establishing, among other things, April 2, 2018 as the deadline for intervention in Phase 1 of this docket. The Commission also noted that a deadline would be set for Phase II of this proceeding.
3. On January 16, 2018, the Commission issued a Scheduling Order establishing, among other things, October 31, 2018 as the deadline for intervention in Phase II of this docket.
4. Vote Solar was an active party and submitted testimony in Docket No. 14-035-

114, In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program, and in Docket No. 13-035-184, In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, each of which played an important sequential role in leading to this docket.

5. Vote Solar is a non-profit grassroots organization working to foster economic opportunity, promote energy independence, and fight climate change by making solar a mainstream energy resource across the United States. Vote Solar engages at the state, local, and federal levels to remove regulatory barriers and implement policies needed to bring solar to scale. Established in 2002, Vote Solar has more than 70,000 members throughout the United States, 140 members in Utah, most of whom reside in Rocky Mountain Power's service territory. Vote Solar is not a trade association and its members are individuals, not corporations. Vote Solar is authorized by its bylaws to represent the interests of its members who receive residential electric service in state agency proceedings related to Vote Solar's purpose, including this proceeding

6. The Commission's decision in this proceeding will have a direct and substantial impact on Vote Solar's legal interests and policy objectives. The proceeding will also substantially and directly affect the legal interests of Vote Solar members who reside in RMP's service territory because it may ultimately impact its rates and the Company's support for solar programs. Vote Solar's mission is directly related to the subject of this proceeding.

7. Vote Solar has not fully determined specific positions it will take or the relief it will seek. Vote Solar seeks to intervene for purposes of protecting its interests as they arise.

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

9. Vote Solar's interests are not adequately represented by another party in this proceeding.

10. If Vote Solar is granted leave to intervene in this proceeding, notices should be sent to the following:

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WHEREFORE, Vote Solar requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 23rd Day of January, 2017.

VOTE SOLAR

/s/ *Rick Gilliam* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

**Docket No. 17-035-61**

I hereby certify that a true and correct copy of the foregoing was served by email this 24<sup>th</sup> day of January, 2018, on the following:

**ROCKY MOUNTAIN POWER**

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*Rick Gilliam* \_\_\_\_\_ /s/