

Kate Bowman
Utah Clean Energy
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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

DOCKET NO. 17-035-61
Utah Clean Energy
Petition to Intervene (Phases 1 and 2)

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Utah Clean Energy, petitions for leave to intervene in this docket. In support of this petition, Utah Clean Energy 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. 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.
3. Utah Clean Energy 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 role in leading to this docket.

4. 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.

6. As an advocate of renewable resources, including distributed energy resources, and a smarter energy future on behalf of all Utahns, Utah Clean Energy's legal rights and interests may be substantially affected by this proceeding.

7. 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.

8. 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.

9. Utah Clean Energy's interests are not adequately represented by another party in this proceeding.

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

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WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 7th day of February, 2018.

UTAH CLEAN ENERGY

/s/ _____