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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

PETITION TO INTERVENE OF UTAH SOLAR ENERGY ASSOCIATION IN PHASE I AND PHASE II OF THIS DOCKET

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-107, Petitioner Utah Solar Energy Association (the “Association”) hereby petitions the Public Service Commission of Utah (the “Commission”) for leave to intervene in the above-entitled matter.

The grounds for this petition are as follows:

1. The Association is a Utah nonprofit corporation whose mission is to champion the growth of Utah’s solar industry through policy advancement, education, advocacy, and business services for industry members, as well as commercial and residential solar customers.
2. The Association’s members include companies that design, build, integrate, install, and/or service rooftop solar systems, or provide other important services in the rooftop solar industry in Utah (“Members”).

3. The Association seeks to intervene in this docket because these proceedings may have a substantial negative effect on the legal rights and interests of the Association and its Members.

4. Rooftop solar requires the customer to make a large upfront investment in solar panels and associated equipment. The customer needs a level of certainty and predictability to be able to evaluate the potential return on investment. The export credit rate the Commission will set in this docket is crucial to the rooftop solar industry and to the Association and its Members.

5. In addition, the Association was an active party 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. 16-035-T14, In the Matter of PacifiCorp's Revisions to Schedule 135, Net Metering and Proposal for New Schedules 135A, Net Metering – Transition Service. Phase I and Phase II of this docket, in which the Association now seeks to intervene, are the direct result and culmination of these previous two dockets.

6. The relief the Association seeks in Phase I and Phase II of this docket is to intervene to help establish the correct export credit rate for excess power generated by rooftop solar customers. The Association also seeks to intervene for purposes of protecting any other interests it may have in this docket as they may appear.

7. The interests of justice and the orderly and prompt conduct of the proceeding will not be materially impaired if the Association is allowed to intervene. The Association will meet any scheduling requirements established by the Commission in this docket.

8. This petition is timely. The deadline for intervention in Phase I is April 2, 2018, and the deadline for intervention in Phase II is October 31, 2018.

9. Notices and filings in this proceeding should be sent to the following:

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WHEREFORE, the Association respectfully requests leave to intervene in Phase I and Phase II of this proceeding and asks that the Commission enter an Order granting the Association's petition to intervene enabling the Association to participate to the full extent allowed by law.

DATED this 7th day of February, 2018.

HOLLAND & HART LLP

/s/ Amanda Smith
Amanda Smith
Engels J. Tejada
Chelsea J. Davis
Attorneys for Utah Solar Energy Association

CERTIFICATE OF SERVICE

I certify that on February 7, 2018, a true and correct copy of the foregoing PETITION TO INTERVENE OF UTAH SOLAR ENERGY ASSOCIATION IN PHASE I AND PHASE II OF THIS PROCEEDING was served by email to the following:

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/s/ Amanda Smith