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*Attorney for Western Resource Advocates*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity	Docket No. 17-035-61 <b>PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES</b>
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Pursuant to Utah Code § 63G-4-207, Utah Administrative Code Rule 746-100-7, and the December 12, 2017 Phase I 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 ratepayers. WRA has participated in electric utility

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

2. WRA has a substantial interest in the above-captioned proceeding. The case is a follow-on proceeding from an earlier, stipulated case (Docket No. 17-035-114) regarding existing net metering customers and future customers installing rooftop solar. WRA was very involved in that proceeding, and submitted several rounds of testimony. This case involves compensation for the energy from rooftop solar facilities, and therefore may impact the development of that resource. The development of renewable energy resources is among the issues of significant interest to WRA. To enable WRA to effectively analyze and assess these issues, and to provide intervenor expertise and input as necessary or appropriate, 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:

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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 20<sup>th</sup> day of March 2018.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES



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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 20<sup>th</sup> day of March 2018 on the following:

**Rocky Mountain Power/PacifiCorp**

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*Penny Anderson*