

Noah Miterko
Policy Associate HEAL Utah
noah@healutah.org

Scott Williams
Executive Director HEAL Utah
scott@healutah.org

824 South 400 West
Suite B111
Salt Lake City, UT 84101
Telephone: 801-355-5055

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF APPLICATION OF
ROCKY MOUNTAIN POWER TO
ESTABLISH EXPORT CREDITS FOR
CUSTOMER GENERATED ELECTRICITY

**HEALTHY ENVIRONMENT ALLIANCE
OF UTAH PETITION TO INTERVENE
IN PHASE II OF THIS DOCKET**

Docket No. 17-035-61

Healthy Environment Alliance of Utah [HEAL Utah] hereby petitions the Public Service Commission of Utah for leave to intervene in Phase II the above-entitled pursuant to Utah Code Ann. §63G-4-207 and Utah Admin. R746-100-7.

The grounds for this petition are as follows:

1. HEAL Utah is a 501(c)(3) organization whose purpose is to advocate and pursue policies which will encourage the development and growth of renewable energy in the state of Utah. HEAL has worked with the Utah legislature, local municipalities, state agencies, and private citizens to formulate policies to benefit renewable energy in the state.

2. HEAL is a grassroots organization which helps inform Utah residents of issues related to and concerning developments in the renewable energy sector. HEAL communicates those developments to its 16,000 Utah supporters on a regular basis.
3. HEAL is a strong advocate for state policies and regulations which help protect the public health and safety of Utah residents, which includes pursuing environmentally friendly energy policies. HEAL has determined that meaningful reductions in pollution and greenhouse gas emissions, that can be achieved through the transition to renewable energy sources, will benefit all Utahns, visitors, and businesses through improved public health, additional economic opportunities, long term energy price stability, and electric grid stability.
4. HEAL Utah 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.
5. Rocky Mountain Power has filed its Request to Establish Export Credits for Customer Generated Electricity, the "Net Billing Program", required as a part of the Transition Period approved in the Settlement and Stipulation among the signing parties dated September 29, 2017.
6. In Rocky Mountain Power's filing, a "Net Billing Program" is presented which decreases the export credit rate paid to customer generated solar. The net of effect of this proposal is an increase in the costs to customer generated solar systems, which, as has been shown in other states, will likely slow the adoption of customer-generated renewable energy significantly.

7. HEAL Utah has a significant interest in the above-captioned matter for the reasons set forth herein. As such HEAL's policy priorities may be substantially affected by the outcome of this docket.
8. Petitioner has not fully determined the specific positions it will take or the relief it will seek. HEAL's positions will be based on information not yet presented. HEAL Utah seeks to intervene for purposes of protecting its interests, and those of its members, as they arise.
9. HEAL's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings.
10. HEAL requests that all notices and filing in this docket be served to:

Noah Miterko
Policy Associate
HEAL Utah
824 South 400 West Suite B111
Salt Lake City, UT 84101
(801) 919 4804
noah@healutah.org

NOW THEREFORE, HEAL Utah respectfully requests leave to intervene in this proceeding and asks that the Commission enter an Order granting HEAL's petition to intervene enabling HEAL to participate to the full extent allowed by law.

Dated this 4/20/2020

HEAL Utah

By: Noah Miterko

Noah Miterko

HEAL Policy Associate

CERTIFICATE OF SERVICE

I certify that on April 20th, 2020, a true and correct copy of the foregoing PETITION TO INTERVENE OF the Healthy Environment Alliance of Utah [HEAL Utah] of the Docket No. 17-035-61 was served by email on the following parties:

Division of Public Utilities

Chris Parker
William Powell
Justin Jetter
Patricia Schmid

ChrisParker@utah.gov
wpowell@utah.gov
jjetter@agutah.gov
pschmid@agutah.gov

Office of Consumer Services

Michele Beck
Cheryl Murray
Robert Moore

mbeck@utah.gov
cmurray@utah.gov
rmoore@agutah.gov

Rocky Mountain Power

Data Request Response Center
Jana Saba

datarequest@pacificorp.com
jana.saba@pacificorp.com
utahdockets@pacificorp.com
emily.wegener@pacificorp.com

Emily Wegener

Vote Solar

Rick Gilliam
Jennifer Selendy
Joshua S. Margolin
Philippe Z. Selendy

rick@votesolar.org
jselendy@selendygay.com
jmargolin@selendygay.com
pselendy@selendygay.com

Utah Clean Energy

Sarah Wright
Kate Bowman
Hunter Holman

sarah@utahcleanenergy.org
kate@utahcleanenergy.org
hunter@utahcleanenergy.org

Utah Solar Energy Association

Ryan Evans

revans@utsolar.org

Salt Lake City Corporation

Megan J. DePaulis

megan.depaulis@slcgov.com

Auric Solar, LLC

Elias Bishop

elias.bishop@auricsolar.com

Western Resource Advocates

Sophie Hayes
Nancy Kelly

sophie.hayes@westernresources.org
nkelly@westernresources.org

Steven S. Michel

smichel@westernresources.org



Noah Miterko

Policy Associate, HEAL Utah