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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities	Docket No. 17-035-T07
	PETITION TO INTERVENE OF THE RENEWABLE ENERGY COALITION

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Renewable Energy Coalition (the “**Coalition**” or “**REC**”) respectfully petitions the Public Service Commission (“**Commission**”) for leave to intervene in this docket regarding the proposed modification of contract terms of PURPA power purchase agreements. In support of this petition, Coalition states as follows:

1. The Coalition was established in 2009, and is comprised of nearly forty members who own, operate or are developing over fifty small renewable energy generation qualifying facilities (“**QFs**”) in Oregon, Idaho, Montana, Washington, Utah, and Wyoming. Several types of entities are members of the Coalition, including irrigation districts, water districts, corporations, and individuals. REC’s members have power purchase agreements with many of the northwest utilities, including Rocky Mountain Power. REC actively participates in numerous regulatory proceedings and legislative processes related to renewable energy, the Public Utility Regulatory

Policies Act, competitive bidding, and power markets.

2. The Coalition's goal is to ensure fair and reasonable contract terms and conditions, and fair avoided cost rates for QFs, including small projects eligible for Schedule 37 prices. Most of the REC's members operate existing projects that have been operating and selling to utilities for numerous years, but many of the members are also developing or planning to develop new projects.

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

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the Coalition to intervene. This request is submitted in advance of that deadline for intervention of July 27, 2017 for this docket.

5. The Coalition's interests are not adequately represented by another party in this proceeding.

6. If the Coalition is granted leave to intervene in this proceeding, notices should be sent to the following:

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WHEREFORE, the Renewable Energy Coalition requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 24th day of June, 2017.

Respectfully Submitted,
SMITH HARTVIGSEN, PLLC

/s/ Adam S. Long
J. Craig Smith
Adam S. Long
Attorneys for the Renewable Energy Coalition

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 24th day of June, 2017 upon the following as indicated below:

Via e-mail to:

Utah Public Service Commission (psc@utah.gov)

Data Request Response Center (datarequest@pacificorp.com)
PacifiCorp

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