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Counsel for Sustainable Power Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Solar Photovoltaic and Thermal Resources

Docket No. 18-035-47

PETITION TO INTERVENE OF THE SUSTAINABLE POWER GROUP ("sPOWER")

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Sustainable Power Group, LLC ("sPower") hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is a Utah limited liability company that develops, owns and operates utility scale wind and solar projects throughout the United States, including in Utah and Wyoming. To date, sPower currently owns more than 150 operating wind and solar facilities across 11 states. Between its operating fleet and projects in construction or in its pipeline, sPower's portfolio of renewable projects represents approximately 13.0 GW of renewable energy.

2. The legal rights and interests of Petitioner and its members may be substantially affected by this proceeding.

3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for the purposes of protecting its interests and the interests of its members as they may appear, particularly on issues of relevance to developers of renewable energy projects.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

5. Notices in this proceeding should be sent to the following:

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 4th day of February, 2019.

HATCH, JAMES & DODGE, P.C.

Prince Dursel

Gary A. Dodge

/s/

Phillip J. Russell

Attorneys for sPower

Certificate of Service **Docket No. 18-035-47**

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served by email this day 4th day of February, 2019, on the following:

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