

Megan J. DePaulis (No. 12492)
SALT LAKE CITY ATTORNEY'S OFFICE
451 South State Street, Suite 505A
P.O. Box 145478
Salt Lake City, Utah 84114-5478
Telephone: (801) 535-7788
Facsimile: (801) 535-7640
megan.depaulis@slcgov.com

Attorney for Salt Lake City Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF APPLICATION OF
ROCKY MOUNTAIN POWER FOR
APPROVAL OF SOLICITATION PROCESS
FOR SOLAR PHOTOVOLTAIC AND
THERMAL RESOURCES

**SALT LAKE CITY CORPORATION'S
PETITION TO INTERVENE**

Docket No. 18-035-47

Pursuant to Utah Code § 63G-4-207(1) and Utah Admin. Code R746--1-108, Salt Lake City Corporation ("Petitioner") hereby petitions for leave to intervene in this docket.

Rule R746-1-108 provides intervention "for a person that wishes to intervene," so long as the petition for intervention is made "in conformance with Section 63G-4-207." Utah Admin. Code R746-1-108. Section 63G-4-207(1)(c) permits intervention when "(a) the petitioner's legal interests may be substantially affected by the formal adjudicative proceeding; and or that the petitioner qualifies as an intervenor under any provision of law." Utah Code § 63G-4-207(1)(c). Under Utah Code section 63G-4-207(2), "[t]he presiding officer shall grant a petition for intervention if the presiding officer determines that: (a) the petitioner's legal interests maybe substantially affected by the formal adjudicative proceeding; and (b) the interests of justice and the orderly and prompt conduct of the adjudicative proceeding's will not be materially impaired. Utah Code § 63G-4-207(2).

In support of this petition, Petitioner states as follows:

1. Petitioner, a local governmental entity, is a participating customer in the Request for Proposals (RFP) being proposed for facilitation by Rocky Mountain Power (“RMP”) as reflected in application materials filed for Docket No. 18-035-47.

2. Petitioner has established municipal renewable energy goals and the Petitioner’s ability to implement these goals will be impacted by the outcomes of this docket.

3. Petitioner has a number of facilities and associated electric utility accounts that may utilize a Utah rate schedule to facilitate development of renewable energy resources through processes detailed in this docket. Outcomes of the docket may impact these interests, including the financial impacts of associated renewable energy investments.

4. Thus, the legal rights and interests of Petitioner may be substantially affected by this proceeding.

5. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for purposes of protecting its interests as they may appear.

6. Petitioner’s request, filed prior to the deadline set forth in Scheduling Order in this matter, is timely. Thus the interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

7. Copies of all notices, orders or pleadings in this proceeding should be served on:

Megan J. DePaulis
SALT LAKE CITY ATTORNEY’S OFFICE
451 S State St, Suite 505A
Salt Lake City, UT 84111
Phone: 801.535.7800
Phone: 801.535.7685
megan.depaulis@slcgov.com

Tyler Poulson
SALT LAKE CITY CORPORATION
451 S State St, Suite 148
Salt Lake City, UT 84111
Phone: 801.535.7259
tyler.poulson@slcgov.com

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

DATED this 12th day of February, 2019.

Salt Lake City Corporation

/s/ Megan J. DePaulis
Attorney for Salt Lake City Corporation

CERTIFICATE OF SERVICE
Docket No. 18-035-47

I hereby certify that on this 12th Day of February, 2019 a true and correct copy of the above and foregoing SALT LAKE CITY CORPORATION'S PETITION TO INTERVENE was served by email to the following:

Rocky Mountain Power:

Jana Saba	jana.saba@pacificorp.com
Joelle Steward	joelle.steward@pacificorp.com
Yvonne Hogle	yvonne.hogle@pacificorp.com
Utah Dockets	utahdockets@pacificorp.com
Data Request Response Center	datarequest@pacificorp.com

Division of Public Utilities

Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Erika Tedder	etedder@utah.gov
Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
DPU Data Request	dpudatarequest@utah.gov

Office of Consumer Services

Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov
Steven Snarr	stevensnarr@agutah.gov
Robert Moore	rmoore@agutah.gov

Hatch, James & Dodge, P.C.

Gary A. Dodge	gdodge@hjdllaw.com
Phillip J. Russell	prussell@hjdllaw.com

Utah Clean Energy

Sarah Wright	sarah@utahcleanenergy.org
Kate Bowman	kate@utahcleanenergy.org
Hunter Holman	hunter@utahcleanenergy.org

Western Resource Advocates

Sophie Hayes	sophie.hayes@westernresources.org
Nancy Kelly	nkelly@westernresources.org
Steven S. Michel	smichel@westernresources.org

/s/ Tyler Poulson