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Attorneys for VK Clean Energy Partners LLP

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
VK CLEAN ENERGY PARTNERS LLP'S
PETITION TO INTERVENE**

Pursuant to Utah Code Ann. § 63G-4-207, Public Service Commission Rule 746-1-108, and the Commission's Scheduling Order entered in the above-captioned docket (the "**Docket**") on January 16, 2019, VK Clean Energy Partners LLP ("**VK Clean Energy**") hereby petitions for leave to intervene in the Docket, and in support thereof, states as follows:

1. VK Clean Energy is a Utah limited liability partnership with the purpose of developing solar photovoltaic generation facilities, and is interested in participating as a potential bidder in Rocky Mountain Power's 2019 Renewable Resources Utah Request for Proposals (the "**2019R Utah RFP**").

2. Rocky Mountain Power ("**RMP**") seeks approval of the 2019R Utah RFP in the above-captioned Docket, and thus this proceeding could substantially affect VK Clean Energy's

rights and interests as a potential bidder.¹ VK Clean Energy petitions for leave to intervene to ensure that the 2019R Utah RFP will create a level playing field in which the bidders can compete fairly consistent with Utah Code Ann. 54-17-807(6)(b). VK Clean Energy seeks to protect its interests as they may arise, and for party status within this proceeding.

3. VK Clean Energy has not yet determined specific positions it will take during this proceeding or the specific relief it will seek.

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

5. VK Clean Energy requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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¹ See September 27, 2017 Order Granting Intervention, Docket No. 17-035-23, at p. 2 (wherein the Commission stated, “we have already granted intervention without objection to Interwest Energy Alliance whose asserted interest is that its members are potential bidders”).

WHEREFORE, VK Clean Energy respectfully requests that the Commission grant its Petition to Intervene in this proceeding to protect its interests as they may appear.

Dated February 12, 2019.

HOLLAND & HART, LLP

/s/ Engels J. Tejada
Engels J. Tejada
Attorney for VK Clean Energy Partners LLP

CERTIFICATE OF SERVICE

I hereby certify that I will cause a true and correct copy of the foregoing to be served via email to the following persons on February 12, 2019:

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