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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 INTERWEST ENERGY ALLIANCE

The Interwest Energy Alliance (“Interwest”) submits this Petition to Intervene pursuant to the Scheduling Order entered in this docket on January 16, 2019 and Utah Code Sec. 63G-4-207, and Utah Admin. Code, Rules R746-1-108 and R746-1-107(1)(a)(ii).

1. Interwest is a 501(c)(6) nonprofit trade association bringing together the nation’s leading renewable energy developers and manufacturers working with the West’s non-governmental organizations to promote renewable energy in six Intermountain states, including Utah, Wyoming, Colorado, New Mexico, Arizona and Nevada. Interwest has previously been admitted as a party in regulatory proceedings in Utah to promote best practices related to resource planning and procurement.

2. Rocky Mountain Power has filed an application with the Utah Public Service Commission (the “Application”) in this docket which will seek approval of a request for proposals (“RFP”) to solicit resources generating approximately 205,000 MWh per year, for up to 25 years, from new geothermal, solar photovoltaic and/or wind facilities that can achieve commercial operation between June 30, 2020 and December 31, 2021. Interwest participated in the rulemaking process opened by the Commission to establish the solicitation process and criteria to be used to identify the competitive market price and select an energy resource, and to address other factors

determined to be in the public interest. The resulting rules, effective in December, 2018, are now codified as Utah Admin. Code Sec. R-746-450.¹

3. Interwest supports the intent of the Application, including the proposed procurement to serve specific customer needs and to fulfill its several of its largest customers' goals set forth in the Joint Clean Energy Cooperation Statement.² Interwest further supports Rocky Mountain Power's desire to own solar energy projects at a competitive rate of return rather than a regulated rate of return, so long as these projects are acquired in a competitive solicitation process which is fair, predictable, and transparent.³

4. Interwest's mission fulfillment is directly affected by the Application, because the procurement proposed by Rocky Mountain Power will serve to promote the goals of municipalities and large commercial customers who desire increased renewable energy to made available to their constituents. These large customers are a critical component of any renewable energy market.

5. Interwest is not yet certain what issues will be raised in the proceeding, what specific relief it will seek, or whether it will retain an expert witness. Interwest's participation will not unduly delay or complicate the proceeding.

¹The Application was filed on December 28, 2018 once the rulemaking was completed:

<https://pscdocs.utah.gov/electric/18docs/1803547/306058AppApprovSolicProc12-28-2018.pdf>.

² Various municipal, state agency, and commercial interests have signed commitments to higher amounts of renewable energy, and the proposed procurement will include resources to serve these goals. "Another Utah city commits to 100% renewables", M. Froese, Jan. 10, 2019, <https://www.windpowerengineering.com/business-news-projects/another-utah-city-commits-to-100-renewables/>. Joint Clean Energy Cooperation Statement, Salt Lake City version, Aug. 8, 2016, <http://www.slcdocs.com/slcgreen/Climate%20&%20Energy/CooperationStatement.pdf>.

³ Interwest submitted initial comments in this docket on February 13, 2019, which raised questions about the interconnection studies under the OATT governing the PacifiCorp queue. Interwest anticipates that the procurement will be conducted in a competitive manner and will address its recommendations to promote best practices to enable it to proceed in a timely manner.

6. Interwest's interests in this procurement application are not represented by any other party. Interwest represents a unique coalition of nongovernmental organizations and business interests, including solar, wind, geothermal and storage developers and manufacturers, and this combination is not reflected in the makeup of any other intervenor.

7. If Interwest's intervention petition is granted, notices, pleadings, and discovery should be delivered to the following:

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THEREFORE, Interwest requests that the Commission grant this petition for permissive intervention so that Interwest is admitted as a party in this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served on the following, by email unless noted otherwise, on this 28th day of February, 2019:

psc@utah.gov, Utah Public Service Commission

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/s/ Lisa Tormoen Hickey