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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<p>In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Solar Photovoltaic and Thermal Resources</p>	<p>Docket No. 18-035-47</p> <p style="text-align: center;"><b>PETITION TO INTERVENE OF RENEWABLE ENERGY COALITION</b></p>
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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, interconnections, and avoided cost rates for QFs. 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 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. will submit reply comments on interconnection and transmission issues raised by other parties' opening comments. 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 February 28, 2019 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 28th day of February, 2019.

Respectfully Submitted,  
**SMITH HARTVIGSEN, PLLC**

/s/ Adam S. Long  
Adam S. Long  
*Attorney for the Renewable Energy Coalition*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 28th day of February 28, 2019 upon the following as indicated below:

Via hand delivery and email to:

Utah Public Service Commission (psc@utah.gov)

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

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