

Utah and throughout the PacifiCorp service territory. Interwest members regularly bid into requests for proposals which may be issued by PacifiCorp to implement the 3-year Action Plan which will be considered as part of PacifiCorp's 2019 Integrated Resource Plan (the "2019 IRP"). Interwest members will offer low-cost, stably-priced, power without fuel costs from their renewable energy projects to serve Utah ratepayers. Interwest will submit detailed comments in response to the 2019 IRP for the Commission's consideration related to the overall cost-effectiveness of the preferred portfolio, based on the accuracy and applicability of the assumptions used in the modeling to prepare the scenarios which were compared by PacifiCorp, the timing of the proposed transmission upgrades, including Gateway South, and the recommendations for the request for proposals and other elements of the Action Plan.

C. Interwest's board members also include environmental organizations working through Interwest in Utah and in other states served by Pacificorp to promote renewable energy development to reduce greenhouse gas emissions and reduce other pollutants resulting from electricity generation around the West, with attention to environmental justice and impacts on communities affected by changing energy policies and market forces. All of these member companies and organizations promote regulatory best practices which will promote cost-effective acquisitions in Utah.

D. No other party to the proceeding will advocate for or represent the interest of Interwest, which combines independent power producer members with non-governmental environmental organizations working throughout the Intermountain West. Interwest does not currently know what particular evidence, if any, it would present in this proceeding. Interwest's intervention will not unduly expand the issues before this Commission. Interwest's participation will not affect or impede the just, orderly and prompt conduct of these proceedings. Therefore,

Interwest requests that its intervention be granted and that it be given party status in this proceeding.

E. Interwest's petition for leave to intervene is timely filed.

THEREFORE, Interwest respectfully requests that the Commission grant its petition for leave to intervene in this proceeding, for it to be granted party status. Further, if the foregoing is approved, Interwest requests that all pleadings, correspondence, discovery and other documents be served on the undersigned counsel for Interwest.

Respectfully submitted this 11th day of December, 2019.

/s/ Lisa Tormoen Hickey

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On Behalf of Interwest Energy Alliance

Interwest Energy Alliance (no separate copies of notices or pleadings required)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served by email this 11th day of December, as follows:

psc@utah.gov, Utah Public Service Commission

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