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BEFORE THE UTAH UTILITY FACILITY REVIEW BOARD

In the Matter of Rocky Mountain Power's Petition for Review and Midway City's Counter-Petition for Review	Docket No. 20-035-03
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**VALLEY-WIDE OPPOSITION TO LARGE TRANSMISSION LINES' (V.O.L.T.)
PETITION TO INTERVENE**

On behalf of the VALLEY-WIDE OPPOSITION TO LARGE TRANSMISSION LINES ("V.O.L.T." or "Petitioner"), and pursuant to Utah Code Ann. § 54-14-303(2)(b), the undersigned counsel hereby submits this Petition to Intervene in Docket No. 20-035-03 to the Utah Utility Facility Review Board ("Board").

In support hereof, Petitioner states as follows:

1. V.O.L.T. is a local nonprofit corporation formed in 2018 by residents and property owners in and around Midway City who are impacted by Rocky Mountain Power's ("RMP's") proposed overhead transmission line in the Heber Valley.

2. V.O.L.T. includes local residents and more than fifty (50) "affected landowners" as defined under Utah Code Ann. § 54-18-102, with property located in the corridor of RMP's Midway line.

3. R.M.P. does not have, and has not asked for, grants of easements from affected property owners that are required for the proposed overhead transmission line siting and construction.

4. V.O.L.T. estimates that the costs of obtaining these easements totals more than \$2,000,000 (two million dollars).

5. V.O.L.T. has offered to facilitate the grant of RMP necessary easements at no cost if RMP agrees relocate its line underground.

6. On Friday, February 21, 2020, Midway City submitted a Counter-Petition for Review to the Board pursuant to § 54-14-303 requesting that the Board ascertain actual costs of rights of way.

7. V.O.L.T. seeks intervention in the matter of Midway City's Counter-Petition pursuant to § 54-14-303(2)(b), on behalf of more than fifty members who are affected property owners within the corridor of RMP's proposed overhead transmission line.

8. V.O.L.T. also seeks intervention pursuant to Utah Code Ann. § 63G-4-207 and R746-200-7 because its members' legal rights and interests will be substantially affected by this proceeding and will not be adequately represented by any other party.

9. V.O.L.T. supports the City's Counter Petition but has not fully determined specific positions it will take or the relief it will seek. V.O.L.T. reserves the right to present briefing, testimony and evidence, examine witnesses and otherwise participate in this docket based upon pleadings, testimony, exhibits and evidence presented by any party to this proceeding.

10. The interests of justice, providing a robust and fully informed record, and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing V.O.L.T. to intervene. In fact, they will be greatly enhanced.

11. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

VOLT Citizens
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Wherefore, for the reasons set forth above, V.O.L.T. requests that the Public Service Commission of Utah grant this timely Petition to Intervene as a party in this proceeding.

Dated this 13th day of March, 2020.

SNELL AND WILMER L.L.P.

/s/ Mark O. Morris

Mark O. Morris, Esq.
Elizabeth M. Brereton, Esq.
Counsel for V.O.L.T.

CERTIFICATE OF SERVICE

I CERTIFY that on March 13, 2020, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Electronic-Mail:

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