

TORMOEN HICKEY LLC
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BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

Application of Rocky Mountain Power for Approval of a)
Solicitation Process for 2020 All Source Request for) Docket No. 20-035-05
Proposals)

PETITION TO INTERVENE

The Interwest Energy Alliance (“Interwest”) hereby files its petition to intervene pursuant to Utah Code Sec. 63G-4-107 and Utah Public Service Commission (“Commission”) Rule R746-1-108 and, in support thereof, states as follows:

A. Interwest is a 501 (c)(6) nonprofit trade association bringing together the nation’s leading solar, wind, geothermal and storage developers with the nongovernmental environmental community to expand renewable energy throughout the Intermountain West, in Utah as well as Wyoming, Colorado, New Mexico, Arizona, and Nevada. Interwest has been actively engaged in public input processes hosted by PacifiCorp to develop its 2019 Integrated Resource Plan (“2019 IRP”), is an active party in the Utah Public Service Commission docket for approval of the 2019 IRP as well as other regulatory dockets in Utah and Wyoming related to implementation of PacifiCorp’s resource planning in recent years as well as other proceedings to promote additional acquisitions of renewable energy which brings stable pricing and lower cost generation resources for electricity consumers.

B. Interwest's members include the leading renewable energy developers working in Utah and throughout the PacifiCorp service territory. These companies will be substantially affected by the proceeding and results of this docket. Interwest members regularly bid into requests for proposals issued by PacifiCorp, to offer low-cost, risk reducing resources operating without fuel costs to serve Utah ratepayers. Interwest will submit detailed comments related to the fairness and transparency of the proposed 2020 All-Source Request for Proposals. Approval of a predictable process along with a request for proposals which clearly identifies the utility's need for capacity, power and essential grid services will enable bidders to prepare the most efficient bids. Inclusion of detailed information about the injection capacity at each point of interconnection will help bidders understand how their proposals will relate to the entire system operations. If bidders understand the methodology to be used to evaluate their bids at every stage of the review process they can provide the most pertinent and useful information to PacifiCorp for bid evaluation purposes. Clarity in an RFP will reduce the risk of rejection of bids due to bidders' misunderstanding of the utility's expectations. Interwest's comments presented in this proceeding will be informed by this experience of its developer members, improving the process and overall chances for the most efficient bids to be successfully evaluated and chosen to serve Utah ratepayers. Interwest has been actively involved in the queue reform process initiated by PacifiCorp at the Federal Energy Regulatory Commission to resolve its interconnection study delays, and this engagement will inform Interwest's advocacy in this proceeding.

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. All of these member companies and organizations promote

regulatory best practices which will promote cost-effective acquisitions in Utah.No other party to the proceeding will advocate for or represent the interests of Interwest’s members, which include both independent power producers and non-governmental environmental organizations working throughout the Intermountain West.

D. 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.

F. Interwest has submitted a separate *Motion for Permission to be Represented by Out-of-State Counsel* coincident with this Petition to Intervene. If the foregoing is approved, Interwest requests that all pleadings, correspondence, discovery and other documents be served as follows, upon counsel for Interwest:

If by U.S. Mail, to: Lisa Tormoen Hickey Tormoen Hickey LLC P.O. Box 7920 Colorado Springs, CO 80933 lisahickey@newlawgroup.com	If by FEDEX, to: Lisa Tormoen Hickey Tormoen Hickey LLC 3225 Templeton Gap Road Suite 217 Colorado Springs, CO 80907 (719) 302-2142
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THEREFORE, Interwest respectfully requests that the Commission grant its petition for leave to intervene in this proceeding, for it to be granted party status.

Respectfully submitted this 6th day of May, 2020.

TORMOEN HICKEY LLC

/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**)
c/o Rikki Seguin, Executive Director
400 Gold Ave. SW Suite 700
Albuquerque, NM 87102
rikki@interwest.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served by email this 6th day of May, 2020, as follows:

psc@utah.gov, Utah Public Service Commission

ROCKY MOUNTAIN POWER Data Request Response Center (datarequest@pacificorp.com) Utah Dockets Utahdockets@pacificorp.com Jacob McDermott Jacob.mcdermott@pacificorp.com Jana Saba Jana.saba@pacificorp.com Joelle Steward Joelle.Steward@pacificorp.com	DIVISION OF PUBLIC UTILITIES ASSISTANT UTAH ATTORNEYS GENERAL Patricia Schmid (pschmid@agutah.gov) Justin Jetter (jjetter@agutah.gov) Chris Parker (chrisparker@utah.gov) William Powell wpowell@utah.gov dpudatarequest@utah.gov	OFFICE OF CONSUMER SERVICES Office of Consumer Services Robert Moore rmoore@agutah.gov Steven Snarr stevensnarr@agutah.gov Michele Beck (mbeck@utah.gov) Cheryl Murray (cmurray@utah.gov)
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/s/Lisa Tormoen Hickey
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