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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of Rocky Mountain Power's Application of Rocky Mountain Power for Approval of Solicitation Process for 2020 All Source Request for Proposals	<b>Docket No. 20-035-05</b>  <b>PETITION TO INTERVENE</b>
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Administrative Rule R746-1-108, the School and Institutional Trust Lands Administrative (“SITLA”) hereby submits this Petition to Intervene. In support of this Petition, SITLA states as follows:

1. SITLA is an independent state agency organized under Title 53C of the Utah Code to manage lands held in trust (“Trust Lands”) by the State of Utah for the sole benefit of the beneficiaries designated in Sections 6, 8, and 12 of the Utah Enabling Act. SITLA generates revenue for the beneficiaries, in part, by leasing Trust Lands and partnering with energy generating companies to construct and manage energy generating projects on Trust Lands.

2. SITLA currently has 15 active solar leases and 5 solar lease applications. The viability of some of the active leases and lease applications depend on the outcome of these proceedings.

3. SITLA also has wind leases, natural gas leases, geothermal leases, and coal leases.

4. SITLA has a significant interest in the results of these proceedings as they will impact which solar leases or other energy generating leases located on Trust Lands obtain a PPA and thus advance through the value chain resulting in SITLA obtaining revenue for its beneficiaries.

5. SITLA does not know what evidence, if any, it would present in these proceedings. SITLA's participation will not affect or impede the just and orderly conduct of these proceedings and therefore, the Commission should grant SITLA's petition to intervene and give SITLA party status.

6. If this petition is approved, SITLA requests that all pleadings, correspondence, discovery, and other documents be served as follows:

If by mail, to:

School and Institutional Trust Lands Administration  
675 E. 500 S., Suite 500  
Salt Lake City, Utah 84102  
Attn: Legal

If by email, to:

[kelibeard@utah.gov](mailto:kelibear@utah.gov)  
[mikejohnson@utah.gov](mailto:mikejohnson@utah.gov)  
[timdaldson@utah.gov](mailto:timdaldson@utah.gov)

SITLA respectfully requests that the Commission grant its petition to intervene in this proceeding and for it to be granted party status.

DATED this June 8, 2020.

SEAN REYES  
UTAH ATTORNEY GENERAL

/s/ Keli Beard

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Keli Beard  
Michael S. Johnson  
Special Assistant Attorneys General  
Attorneys for Defendants

## CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2020 a true and correct copy of the foregoing was delivered to the following as indicated below:

By Email:

Pacificorp:

Data Request Response Center ([datareq@pacificorp.com](mailto:datareq@pacificorp.com); [utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))

Rocky Mountain Power:

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/s/ Keli Beard

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Keli Beard

Attorney for School and Institutional Trust Lands