



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 2021 Integrated Resource Plan (the "2021 IRP"). Interwest members develop renewable energy projects providing lower costs and stable prices without volatile fuel costs to serve Utah ratepayers. Interwest will submit detailed comments in response to the 2021 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 Energy 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. These organizations work collaboratively with the renewable energy industry to reduce greenhouse gas emissions and other pollutants resulting from electricity generation around the West, while highlighting the economic benefits of renewable energy development throughout the region. All of these member companies and organizations promote regulatory best practices which will promote cost-effective energy supply resource 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, but 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.

Interwest regularly works with other parties to avoid duplication of effort for the Commission and its staff. 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 as follows:

By electronic mail, if possible, to: Lisa Tormoen Hickey  
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Also to: Nate Blouin  
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Respectfully submitted this 9th day of September, 2021.

*/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)**

**Rikki Seguin, Executive Director**

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**Albuquerque, NM 87102**

**[rikki@interwest.org](mailto:rikki@interwest.org)**

CERTIFICATE OF SERVICE  
21-035-09

I hereby certify that a true and correct copy of the foregoing was efiled and served by email this 9th day of September, 2021, as follows:

[psc@utah.gov](mailto:psc@utah.gov), Utah Public Service Commission

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*/s/Lisa Tormoen Hickey*  
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