Lisa Tormoen Hickey CO. #15046.WY # 5-2436 Tormoen Hickey LLC 3225 Templeton Gap Road Suite 217 Colorado Springs, CO 080907

#### BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's 2021 Integrated Resource Plan	)	Docket No. 21-035-09

### PETITION TO INTERVENE

The Interwest Energy Alliance ("Interwest") hereby files its petition to intervene pursuant to Utah Code Sec. 63G-4-207 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 around 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 integrated resource plans and in regulatory dockets in Utah and Wyoming related to consideration of PacifiCorp's resource planning and proposed requests for proposals 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 will be substantially affected by the proceeding and results of this docket. Interwest's members include the leading renewable energy developers working in

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

Tormoen Hickey LLC

P.O. Box 7920

Colorado Springs, CO 80933 lisahickey@newlawgroup.com

719.302.2142

Also to: Nate Blouin

Policy Manager

Interwest Energy Alliance

2647 Jasper Street

Salt Lake City, UT 84106

nate@interwest.org 603.724.3266

Respectfully submitted this 9th day of September, 2021.

## /s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey, CO. #15046.WY # 5-2436 TORMOEN HICKEY LLC P.O. Box 7920

Colorado Springs, CO 80933 Telephone: 719-302-2142

E-mail: lisahickey@newlawgroup.com

## **On Behalf of Interwest Energy Alliance**

Interwest Energy Alliance (no separate copies of notices or pleadings required)
Rikki Seguin, Executive Director
400 Gold Ave. SW Suite 700
Albuquerque, NM 87102
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, Utah Public Service Commission

ROCKY MOUNTAIN POWER	DIVISION OF PUBLIC UTILITIES
Data Request Response Center	Patricia Schmid (pschmid@agutah.gov)
(datarequest@pacificorp.com)	Justin Jetter (jjetter@agutah.gov)
Utah Dockets	Chris Parker (chrisparker@utah.gov)
<u>Utahdockets@pacificorp.com</u>	William Powell (wpowell@utah.gov)
Jana Saba	dpudatarequest@utah.gov
Jana.saba@pacificorp.com	
Richard Garlish	
Richard.garlish@pacificorp.com	
Emily Wegener	
Emily.wegener@pacificorp.com	
UTAH ASSOCIATION OF ENERGY USERS	UTAH CLEAN ENERGY
Phillip J. Russell ( <u>prussell@hjdlaw.com</u>	hunter@utahcleanenergy.org
	kate@utahcleanenergy.org
	sarah@utahcleanenergy.org
OFFICE OF CONSUMER SERVICES	Western Resource Advocates
Steven Snarr	Sophie Hayes
stevensnarr@agutah.gov	sophie.hayes@westernresources.org
Robert Moore	Nancy Kelly
rmoore@agutah.gov	Nancy.kelly@westernresource.org
Michele Beck ( <u>mbeck@utah.gov</u> )	Callie Hood
	Callie.hood@westernresources.org
Sierra Club	
Rose Monahan (rose.monahan@sierraclub.org	
Ana Boyd (ana.boyd@sierraclub.org	

/s/*Lisa Tormoen Hickey* Lisa Tormoen Hickey