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*Counsel for the Renewable Energy Coalition*

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of PacifiCorp's 2021 Integrated Resource Plan	Docket No. 21-035-09
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**PETITION TO INTERVENE OF THE RENEWABLE ENERGY COALITION AND  
MOTION FOR PERMISSION TO BE REPRESENTED BY OUT-OF-STATE  
ATTORNEY**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Renewable Energy Coalition (the “Coalition” or “REC”) respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket regarding PacifiCorp’s 2021 Integrated Resource Plan. Additionally, pursuant to Utah Admin. Code R746-1-107(1)(a)(ii), the undersigned attorney, licensed in Oregon, Washington, and Wyoming (“Counsel”), respectfully asks that he be allowed to represent the Coalition in this proceeding without associated Utah counsel. Counsel moves for permission to represent the Coalition. In support of this petition to intervene and motion for permission to be represented by out-of-state Counsel, Coalition states as follows:

1. The Coalition was established in 2009, and is comprised of nearly forty members who own, operate or are developing over fifty small renewable energy generation qualifying

facilities (“QFs”) in Oregon, Idaho, Montana, Washington, Utah, and Wyoming. Several types of entities are members of the Coalition, including irrigation districts, water districts, corporations, and individuals. REC’s members have power purchase agreements with many of the Northwest utilities, including PacifiCorp and its subsidiaries. REC actively participates in numerous regulatory proceedings and legislative processes related to renewable energy, the Public Utility Regulatory Policies Act, competitive bidding, and power markets.

2. The Coalition’s goal is to ensure fair and reasonable contract terms and conditions, and avoided cost rates for QFs, including small projects eligible for Schedule 37 prices. Most of the REC’s members operate existing projects that have been operating and selling to utilities for numerous years, but many of the members are developing or planning to develop new projects.

3. The Coalition has not fully determined specific positions it will take or the relief it will seek. The Coalition seeks to intervene for purposes of protecting its interests as they arise.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the Coalition to intervene.

5. The Coalition’s interests are not adequately represented by another party in this proceeding.

6. Admission of Counsel would serve the interests of the parties and the efficient and just administration of the case. If the Coalition was required to hire an attorney licensed in Utah, then it would pose an unreasonable hardship and financial burden on the Coalition and prevent effective participation in the proceeding. The Coalition has already retained Counsel on a regular basis to represent the Coalition in various proceedings before utility commissions in Oregon, Washington, and Wyoming. It would be an unreasonable and costly hardship to find local representation in addition to Counsel. Counsel is licensed in Oregon and certificates of good

standing from Oregon, Washington, and Wyoming are attached as Exhibits A, B, and C respectively. Pursuant to Utah Admin. Code R746-1-107(2), application for pro hac vice admission to the Utah State Bar or partnering with an attorney licensed in Utah is not required.

7. Admission of Counsel will help preserve efficiency and not unduly delay or burden the proceedings. Counsel has represented clients in Utah administrative proceedings before and is familiar with the process. Counsel also has collaborated with other regulatory counsel in Utah before. Counsel is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court.

8. Having complied with the applicable statute and rules, the Coalition requests permission to be represented by the undersigned Counsel as counsel of record in this proceeding.

9. If the Coalition is granted leave to intervene in this proceeding and Counsel is granted permission to represent the Coalition in this proceeding, then notices should be sent to the following:

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E-Mail: irion@sanger-law.com

Renewable Energy Coalition  
Attn: John Lowe  
PO Box 25576  
Portland, OR 97298  
Telephone: 503-997-3033  
E-Mail: jravenesanmarcos@yahoo.com

WHEREFORE, the Renewable Energy Coalition requests leave to intervene in this proceeding to protect its interests as they may arise and the Renewable Energy Coalition requests permission to be represented by the undersigned Counsel as counsel of record in this proceeding.

DATED this 4th day of March 2022

Respectfully Submitted,

Sanger Law, PC

/s/ Irion A. Sanger  
Irion A. Sanger  
*Attorney for the Renewable Energy Coalition*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on this 4th day of March 2022 upon the following as indicated below:

### **Rocky Mountain Power**

Richard Garlish	richard.garlish@pacificorp.com
Jana Saba	jana.saba@pacificorp.com
Emily Wegener	emily.wegener@pacificorp.com
	utahdockets@pacificorp.com
	datarequest@pacificorp.com

### **Office of Consumer Services**

Steven Snarr	stevensnarr@agutah.gov
Michele Beck	mbeck@utah.gov
Robert Moore	rmoore@agutah.gov

### **Utah Division of Public Utilities**

Chris Parker	chrisparker@utah.gov
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Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
	dpudatarequest@utah.gov

### **Utah Association of Energy Users**

Phillip J. Russell	prussell@jdrslaw.com
Don Hendrickson	dhendrickson@energystrat.com

### **Sierra Club**

Rose Monahan	rose.monahan@sierraclub.org
Ana Boyd	ana.boyd@sierraclub.org

### **Interwest Energy Alliance**

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Nate Blouin	nate@interwest.org

### **Fervo Energy Company**

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Dawn Owens	dawn@fervoenergy.com

### **Utah Clean Energy**

Hunter Holman	hunter@utahcleanenergy.org
Kate Bowman	kate@utahcleanenergy.org

### **Southwest Energy Efficiency Project**

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Justin Brant	jbrant@swenergy.org

**Western Resource Advocates**

Nancy Kelly  
Sophie Hayes  
Steve Michel  
Callie Hood

nancy.kelly@westernresources.org  
sophie.hayes@westernresources.org  
steve.michel@westernresources.org  
callie.hood@westernresources.org

/s/ Irion A. Sanger

**Attachment A**

**Oregon State Bar Certificate of Good Standing for Irion Sanger**

## Certificate of Good Standing

State of Oregon                )  
  ) ss.  
County of Washington    )

I, Troy Wood, do hereby certify that I am Regulatory Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

**IRION SANGER, BAR NO. 003750**

was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on October 4, 2000.

There are no grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Mr. Sanger is an active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 18<sup>th</sup> day of November, 2021.



Troy Wood  
Regulatory Counsel  
Oregon State Bar

\*This certificate expires 60 days from the date of issuance\*

**Attachment B**

**Washington State Bar Certificate of Good Standing for Irion Sanger**

# IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION	)	BAR NO. 57564
	)	
OF	)	<b>CERTIFICATE</b>
	)	
IRION SANGER	)	<b>OF</b>
	)	
TO PRACTICE IN THE COURTS OF THIS STATE	)	<b>GOOD STANDING</b>
	)	

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I, Sarah R. Pendleton, Deputy Clerk of the Supreme Court of the State of Washington, hereby certify

## IRION SANGER

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on January 26, 2021, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this Court on the 18<sup>th</sup> day of November, 2021.

A handwritten signature in black ink, appearing to read "Sarah R. Pendleton".

Sarah R. Pendleton  
Supreme Court Deputy Clerk  
Washington State Supreme Court

**Attachment C**

**Wyoming State Bar Certificate of Good Standing for Irion Sanger**

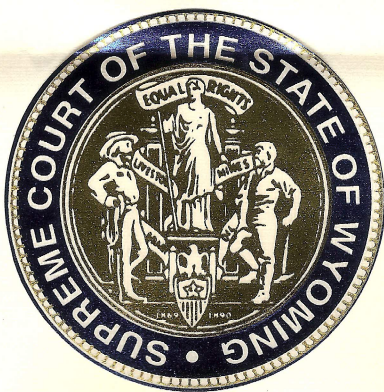
**CERTIFICATE OF THE CLERK OF THE  
SUPREME COURT  
OF THE  
STATE OF WYOMING**

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I, Shawna Goetz, Clerk of the Supreme Court of the State of Wyoming, hereby certify that, according to the records of my office:

**Irion August Sanger**

was on the 15th day of March, 2019, duly admitted to practice as an Attorney and Counsellor at Law in all the courts of Wyoming; that the above admittee has never been disbarred or suspended; that no disciplinary proceedings are pending against this admittee; and that this admittee's name now appears on the Roll of Attorneys in this office as a member of the bar in good standing.



Given under my hand and the seal of said  
Court this 22nd day of November, 2021.

Shawna Goetz, Clerk

*Laura Mickey*

by deputy