

Lisa Tormoen Hickey
CO. #15046.WY # 5-2436
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BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

Application of Rocky Mountain Power for Approval of)
Solicitation Process for 2022 All Source Request for) Docket No. 21-035-52
Proposals)

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 renewable energy 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 (“RFPs”) as well as other proceedings to promote additional acquisitions of renewable energy which brings stable pricing and lower cost generation resources for electricity consumers. Interwest was actively engaged in PacifiCorp’s application for approval of its RFP to implement the 2019 Integrated Resource Plan in Utah Public Service Commission Docket No. 20-035-05, *In the Matter of the Application of Rocky Mountain Power for Approval of a Solicitation*

Process for 2020 All Source Request for Proposals. Interwest members are interested in supporting fair and competitive requests for proposals without bias related to technology or ownership, to help ensure the most efficient resources are acquired in all utility proceedings.

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 issued by electric utilities and may submit responses to the RFP to 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 proposed RFP based on its experience working with PacifiCorp as well as other utilities working in other intermountain states. Interwest promotes regulatory best practices which will promote cost-effective energy supply resource acquisitions in Utah.

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.

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
Policy Manager
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Respectfully submitted this 9th day of September, 2021.

/s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey, CO. #15046.WY # 5-2436

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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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CERTIFICATE OF SERVICE
Docket No. 21-035-52

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 Data Request Response Center (datarequest@pacificorp.com) Utah Dockets Utahdockets@pacificorp.com Jana Saba Jana.saba@pacificorp.com Joelle Steward Joelle.Steward@pacificorp.com Emily.Wegener@pacificorp.com	DIVISION OF PUBLIC UTILITIES Erika Tedder (etedder@utah.gov) ASSISTANT UTAH ATTORNEYS GENERAL Patricia Schmid (pschmid@agutah.gov) Justin Jetter (jjetter@agutah.gov) Robert Moore (rmoore@agutah.gov) Victor Copeland (vcopeland@agutah.gov) dpudatarequest@utah.gov
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/s/Lisa Tormoen Hickey
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