

TORMOEN HICKEY LLC
Lisa Tormoen Hickey, Colo. #15046, WY #5-2436
P.O. Box 7920
Colorado Springs, CO 80933
Telephone: 719-302-2142
E-mail: lisahickey@newlawgroup.com

BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

Application of Rocky Mountain Power for a)
Certificate of Public Convenience and)
Necessity for the Gateway South Transmission) Docket No. 21-035-54
Project)
)

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 R7461-108 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 including the 2019 Integrated Resource Plan under which the Gateway South Transmission Project was analyzed in relation to its cost-effective support for new generation resources in the preferred portfolio, some of which will be located in Utah. Interwest has also been admitted as an intervenor 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 and new transmission 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, including those that have or may be issued by PacifiCorp to interconnect with the Gateway South Transmission Project. 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, testimony, and/or other analysis in response to Application for the Commission's consideration related to the overall public convenience and necessity of the proposed project.

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 and transmission expansion 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, by electronic mail, if possible, as follows:

Nate Blouin Interwest Energy Alliance 2647 Jasper Street Salt Lake City, UT 84106 nate@interwest.org 603.724.3266	Lisa Tormoen Hickey Tormoen Hickey LLC P.O. Box 7920 Colorado Springs, CO 80933 lisahickey@newlawgroup.com 717.302.2142	
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Respectfully submitted this 19th day of October, 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
21-035-54

I hereby certify that a true and correct copy of the foregoing was efiled and served by email this 19th day of October, 2021, as follows:

psc@utah.gov, Utah Public Service Commission

<p>ROCKY MOUNTAIN POWER Data Request Response Center datarequest@pacificorp.com Utah Dockets Utahdockets@pacificorp.com Jana Saba Jana.saba@pacificorp.com Richard Garlish Richard.garlish@pacificorp.com Emily Wegener Emily.wegener@pacificorp.com John Hutchings john.hutchings@pacificorp.com Katherine McDowell katherine@mrg-law.com Adam Lowney adam@mrg-law.com</p>	<p>DIVISION OF PUBLIC UTILITIES Chris Parker chrisparker@utah.gov William Powell wpowell@utah.gov Madison Galt mgalt@utah.gov dpudatarequest@utah.gov</p>
<p>UTAH ASSOCIATION OF ENERGY USERS Phillip J. Russell prussell@hjdllaw.com</p>	<p>UTAH CLEAN ENERGY hunter@utahcleanenergy.org kate@utahcleanenergy.org sarah@utahcleanenergy.org</p>
<p>OFFICE OF CONSUMER SERVICES Michele Beck mbeck@utah.gov Alyson Anderson akanderson@utah.gov Bela Vastag bvastag@utah.gov Alex Ware aware@utah.gov ocs@utah.gov</p>	<p>WESTERN RESOURCE ADVOCATES Sophie Hayes sophie.hayes@westernresources.org Nancy Kelly Nancy.kelly@westernresource.org Callie Hood Callie.hood@westernresources.org</p>

	ATTORNEY GENERAL Steven Snarr stevensnarr@agutah.gov Robert Moore rmoore@agutah.gov Patricia Schmid pschmid@agutah.gov Justin Jetter jjetter@agutah.gov Victor Copeland vcopeland@agutah.gov
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/s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey