

INTERWEST ENERGY ALLIANCE
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Murray, UT 84107
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BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

PacifiCorp’s 2023 Integrated)	
Resource Plan)	Docket No. 23-035-10
)	
)	

PETITION TO INTERVENE AND NOTICE OF APPEARANCE

Petition to Intervene:

The Interwest Energy Alliance (“Interwest”) hereby files its petition to intervene in Docket No. 23-035-10, PacifiCorp’s 2023 Integrated Resource Plan, pursuant to Utah Code Sec. 63G-4-207 and Utah Public Service Commission (“Commission”) Rule R7461-108. In support of this petition, 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 the public input processes hosted by PacifiCorp to develop its 2023 Integrated Resource Plan (IRP). Interwest has been admitted as an intervenor in prior regulatory dockets in Utah and Wyoming related to consideration of PacifiCorp's resource planning, Requests for Proposals (RFPs), and other proceedings related to additional acquisitions of renewable energy and new transmission.

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 RFPs, including those that may be issued by PacifiCorp as a result of this 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, testimony, and/or other analysis in response to the IRP Application for the Commission's consideration related to the overall adequacy and impact of the filing.

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.

Notice of Appearance:

A. Sam Johnston, Utah Bar #014688, enters his appearance for the Interwest Energy Alliance.

B. Pursuant to Rule R746-1-107 of the Rules of Practice and Procedure of the Utah Public Service Commission, Christopher Leger, a full-time employee of the Interwest Energy Alliance, and attorney licensed in Colorado, Wyoming, and the District of Columbia, hereby enters his appearance to represent the Interwest Energy Alliance.

C. Interwest intends to fully participate in this docket, which will be helpful for a thorough consideration of the relevant issues to help ensure fairness and clarity in the review of the IRP acknowledgement request.

R746-1-107. Representation of Parties, states as follows:

- (1) A party may:
 - (a) be represented by:
 - (i) an attorney licensed to practice in Utah; or
 - (ii) ***an attorney licensed in a foreign state, if the attorney provides the Commission with a certificate of good standing from the state where licensed;***
 - (b) represent oneself individually; or
 - (c) ***if not an individual, represent itself through an officer or employee.***
 - (2) An attorney who appears pursuant to Subsection R746-1-107(1)(a)(ii) is not required to:
 - (a) apply for pro hac vice admission to the Utah State Bar;
 - or
 - (b) partner with counsel licensed in Utah.

(emphasis added). Mr. Leger is a full-time employee of Interwest as well as an attorney licensed in Colorado, the District of Columbia, and Wyoming. Certificates of good standing from these jurisdictions are attached as Attachments A, B, and C.

D. Mr. Leger regularly collaborates with other regulatory counsel in Utah and other jurisdictions. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court.

E. Having complied with the applicable statute and rules, Interwest requests permission to be represented by Mr. Leger to be admitted for this purpose as counsel of record in this proceeding.

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:

Chris Leger Interwest Energy Alliance 3433 Ranch View Dr. Cheyenne, WY 82001 chris@interwest.org 307.421.3300	Sam Johnston Interwest Energy Alliance 5753 S Ridge Creek Road Murray, UT 84107 sam@interwest.org 801.440.4155
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Respectfully submitted this 12th day of April, 2023.

By: /s/ Christopher Leger

Christopher Leger, CO #42013, WY #6-3963, DC #499541

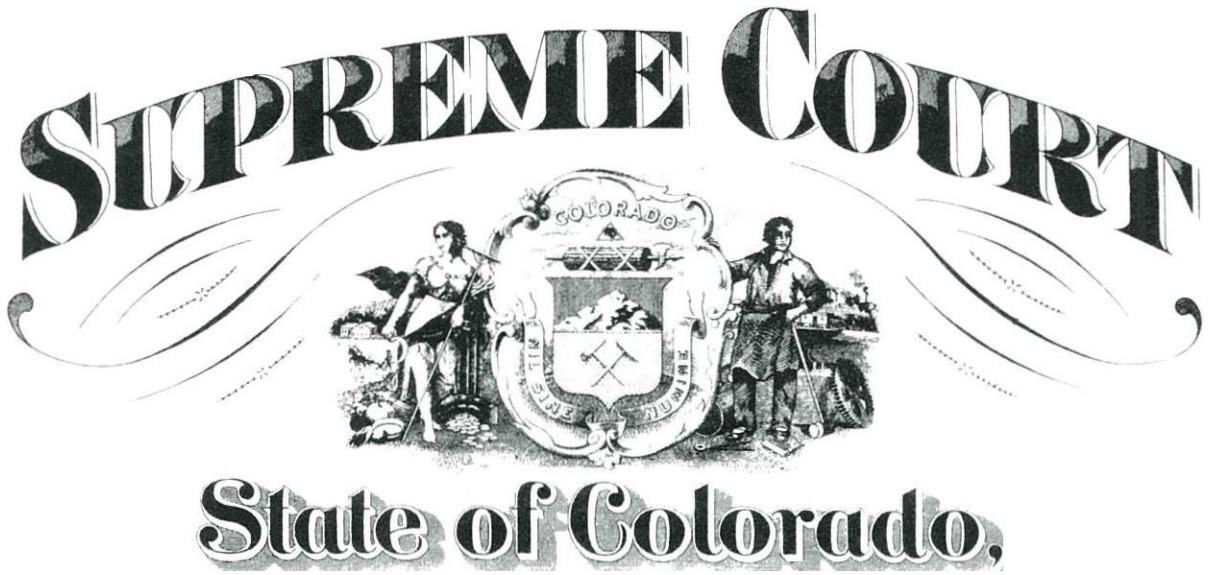
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By: /s/ Sam Johnston

Sam Johnston, UT # 014688
5753 S Ridge Creek Road
Murray, UT 84107
Telephone: 801-440-4155
E-mail : sam@interwest.org

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



STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Christopher Leger

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys

and Counselors at Law in my office of date the 17th

day of May A.D. 2010 and that at the date hereof

the said Christopher Leger is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

7th day of April A.D. 2023

Cheryl Stevens

Clerk

By

Mirpa Sanchez

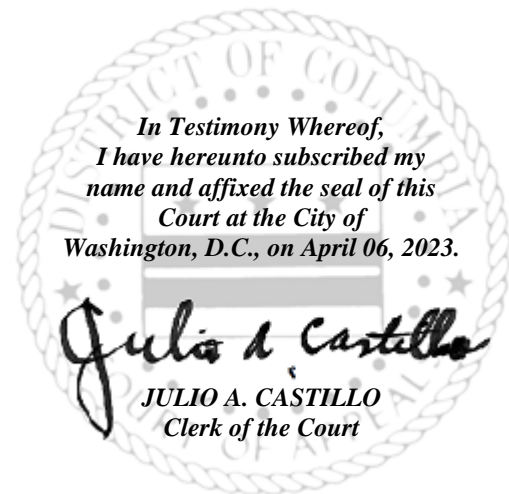
Deputy Clerk



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

Christopher W Leger

*was duly qualified and admitted on May 11, 2007 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.*



Issued By:

A handwritten signature in black ink that reads "David Chu".

*David Chu - Director, Membership
District of Columbia Bar Membership*

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbbar.org.***



April 6, 2023

Attorney: Mr. Christopher Wayne Leger

Mr. Christopher Wayne Leger was admitted to practice by Exam in Wyoming on October 31, 2005, and is enrolled as attorney number 6-3963.

Status: Active

An attorney's status is defined by the Bylaws of the Wyoming State Bar. "Active" means the attorney is eligible to appear as an attorney in all Wyoming state courts and to otherwise engage in the practice of law. "Honorable" means the attorney serves as a judge. "Inactive" means the attorney has voluntarily chosen inactive status and is not currently eligible to appear as an attorney in any Wyoming court or to otherwise engage in the practice of law in Wyoming. "Disability Inactive" means the attorney is unable to practice law because of a physical, mental or emotional infirmity or illness. "Retired" or "Honorable Retired" mean the attorney or judge has voluntarily elected retired status and is no longer eligible to appear as an attorney in any Wyoming court or to engage in the practice of law. "Emeritus" means the attorney has elected to perform only pro bono legal services but not to otherwise engage in the practice of law, "Suspended" means the attorney has been suspended from the practice of law, either for nonpayment of annual license fees, noncompliance with mandatory continuing legal education requirements, or as a disciplinary sanction.

Standing: Good Standing

"Good Standing" means that the attorney's license fees are current, mandatory continuing legal education, if required, is current, and the attorney's right to practice is not currently suspended.

Discipline

Requests for a disciplinary history must be submitted to the Office of Bar Counsel.

I hereby certify that the preceding information is correct.


Sharon Wilkinson
Executive Director

CERTIFICATE OF SERVICE
23-035-10

I hereby certify that a true and correct copy of the foregoing was e-filed and served by email this 12th day of April, 2023, as follows:

psc@utah.gov - Utah Public Service Commission

<p>ROCKY MOUNTAIN POWER</p> <p>Data Request Response Center datarequest@pacificorp.com</p> <p>Utah Dockets utahdockets@pacificorp.com</p> <p>IRP irp@pacificorp.com</p> <p>Jana Saba jana.saba@pacificorp.com</p> <p>Joseph Dallas joseph.dallas@pacificorp.com</p> <p>Carla Scarsella Carla.scarsella@pacificorp.com</p>	<p>DIVISION OF PUBLIC UTILITIES</p> <p>Chris Parker chrisparker@utah.gov</p> <p>Madison Galt mgalt@utah.gov</p> <p>Patricia Schmid pschmid@agutah.gov</p> <p>Patrick Grecu pgrecu@agutah.gov</p> <p>dpudatarequest@utah.gov</p>
<p>UTAH ASSOCIATION OF ENERGY USERS</p> <p>Phillip J. Russell prussell@hjdlaw.com</p> <p>Don Hendrickson dhendrickson@energystrat.com</p>	<p>UTAH CLEAN ENERGY</p> <p>Sarah Puzzo spuzzo@utahcleanenergy.org</p> <p>Logan Mitchell logan@utahcleanenergy.org</p> <p>Sarah Wright sarah@utahcleanenergy.org</p>
<p>OFFICE OF CONSUMER SERVICES</p> <p>Michele Beck mbeck@utah.gov</p> <p>Bela Vastag bvastag@utah.gov</p> <p>Robert Moore rmoore@agutah.gov</p> <p>ocs@utah.gov</p>	<p>WESTERN RESOURCE ADVOCATES</p> <p>Sophie Hayes sophie.hayes@westernresources.org</p> <p>Nancy Kelly Nkelly@westernresource.org</p> <p>Steven Michel smichel@westernresources.org</p>

<p>SIERRA CLUB</p> <p>Rose Monahan Rose.monahan@sierraclub.org Leah Bahramipour Leah.bahramipour@sierraclub.com</p>	<p>SOUTHWEST ENERGY EFFICIENCY PROJECT</p> <p>Justin Brant jbrant@swenergy.org</p>
<p>SALT LAKE CITY CORP</p> <p>Sara Montoya Sara.montoya@slcgov.com Christopher Thomas Christopher.thomas@slcgov.com</p>	<p>FERVO ENERGY COMPANY</p> <p>Sarah Jewett sarah@fervoenergy.com Dawn Owens dawn@fervoenergy.com</p>
<p>INTERWEST ENERGY ALLIANCE</p> <p>Chris Leger chris@interwest.org Sam Johnston sam@interwest.org</p>	

/s/Chris Leger
Chris Leger