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Attorney for the Community Renewable Energy Agency

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act	Docket No. 25-035-06
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**PETITION TO INTERVENE OF THE
COMMUNITY RENEWABLE ENERGY AGENCY**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Community Renewable Energy Agency (“Petitioner” or “Agency”) hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. The Application filed by Rocky Mountain Power (“RMP” or “Company”) is filed pursuant to the Community Clean Energy Act, codified at Utah Code §§ 54-17-901 to -909 (“Act”), and in support of a Community Clean Energy Program (“Program”).
2. The Commission has adopted rules governing the Program, as set forth at Utah Admin. Code R746-314 (“Program Rules”).
3. The Program Rules require communities that wish to participate in the Program to adopt a governance agreement that establishes a decision-making process for program design,

resource solicitation, resource acquisition, and other program issues. *See* Utah Admin. Code R746-314-101(9).

4. The communities that wish to participate in the program adopted such a governance agreement when they adopted the Interlocal Cooperation Agreement Among Public Entities Regarding the Community Renewable Energy Program (“Governance Agreement”).

5. The Governance Agreement established the Agency and granted it authority to act on behalf of the participating communities with respect to certain aspects of the Program including, among other things, solicitations for Program resources.

6. The Agency has worked with the Company to develop the Program that is the subject of the Application, though the Agency and the Company are not aligned on all aspects of the Program design.

7. Pursuant to the Act and Program Rules, the communities that seek to participate in the Program are automatically made a party to Commission proceedings regarding the Program. *See* Utah Code § 54-17-904(5); Utah Admin. Code R746-314-401(2).

8. Neither the Act nor the Program Rules make the Agency a party to Commission proceedings regarding the Program. As such, the Agency seeks to intervene to represent the interests of the communities with respect to the solicitation, as contemplated by the Act and the Rules.

9. The legal rights and interests of Petitioner and the communities it represents may be substantially affected by this proceeding and Petitioner seeks to intervene to protect its interests and those of the communities it represents.

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

11. Notices in this proceeding should be sent to the following:

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 7th day of March 2024.

Respectfully submitted,

By:



Phillip J. Russell
JAMES DODGE RUSSELL & STEPHENS, P.C.

*Attorney for the Community Renewable Energy
Agency*

Certificate of Service
Docket No. 25-035-06

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served by email this 7th day of March 2025 on the following:

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/s/ Phillip J. Russell