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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Solar Photovoltaic and Thermal Resources</p>	<p>Docket No. 18-035-47</p> <p style="text-align: center;">PETITION TO INTERVENE OF NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION</p>
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Northwest and Intermountain Power Producers Coalition (“**NIPPC**”), respectfully petitions the Public Service Commission (“**Commission**”) for leave to intervene in this docket regarding the proposed modification of contract terms of PURPA power purchase agreements. In support of this petition, NIPPC states as follows:

1. NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of its members in developing rules and

policies that help achieve a competitive electric power supply market in the Pacific Northwest.

2. NIPPC is committed to facilitating cost effective electricity sales, offering consumers choice in their energy supply, and advancing fair, competitive power markets. NIPPC actively participates in state regulatory proceedings to ensure that competitive procurement and requests for proposals are fair, balanced, and non-discriminatory. In particular, NIPPC's participation has focused on the way in which interconnection and transmission limitations can reduce the competitive options available, increase costs for ratepayers, and bias the results toward utility ownership.

3. NIPPC has a diverse membership including independent power producers, electricity service suppliers, and transmission companies. NIPPC's members include Calpine Corp., Constellation Exelon, Cypress Creek Renewables, Direct Energy, Ecoplexus, EDF Renewable Energy, EDP Renewables, Invenergy LLC, Morgan Stanley NewSun Energy, National Grid, Obsidian Renewables, Perennial Power Holdings, Inc., Shell Energy North America, Sierra Pacific Industries, TLS Capital, and TransAlta Energy Marketing, Inc.

4. The NIPPC has not fully determined specific positions it will take or the relief it will seek. NIPPC will submit reply comments on interconnection and transmission issues raised by other parties' opening comments. The NIPPC seeks to intervene for purposes of protecting its interests as they arise.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the NIPPC to intervene. This request is submitted in advance of that deadline for intervention of February 28, 2019 for this docket.

5. The NIPPC's interests are not adequately represented by another party in this proceeding.

6. If the NIPPC is granted leave to intervene in this proceeding, notices should be sent to the following:

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WHEREFORE, the Northwest and Intermountain Power Producers Coalition requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 28th day of February, 2019.

Respectfully Submitted,
SMITH HARTVIGSEN, PLLC

/s/ Adam S. Long
Adam S. Long
*Attorney for the Northwest and Intermountain
Power Producers Coalition*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 28th day of February 2019 upon the following as indicated below:

Via e-mail to:

Utah Public Service Commission (psc@utah.gov)

Data Request Response Center (datarequest@pacificorp.com),
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