

SEP 28 2015

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)
OF ROCKY MOUNTAIN POWER FOR)
MODIFICATION OF CONTRACT TERM) **Docket No. 20000-481-EA-15**
OF PURPA POWER PURCHASE) **(Record No. 14220)**
AGREEMENTS WITH QUALIFYING)
FACILITIES)

**RENEWABLE ENERGY COALITION'S
PETITION FOR LEAVE TO INTERVENE AND REQUEST FOR HEARING**

Renewable Energy Coalition, pursuant to Section 113 of the Rules of the Wyoming Public Service Commission (“PSC” or “Commission”), and the PSC’s August 28, 2015 “Notice of Application,” hereby respectfully files this Petition for Leave to Intervene and Request for Hearing in the above-captioned matter. Renewable Energy Coalition states and alleges as follows as grounds for this Petition:

Renewable Energy Coalition was established in 2009, and is comprised of over thirty (30) members who own and operate over fifty (50) non-intermittent Qualifying Facilities (“QFs”) in Oregon, Idaho, Washington, Utah, and Wyoming. Renewable Energy Coalition’s members have power purchase agreements with Northwest and Rocky Mountain electric utilities, including Rocky Mountain Power (“RMP”).

Renewable Energy Coalition’s members include government entities and municipal corporations, including Shoshone Irrigation District, which is located in Wyoming. Sales from these QFs provide significant benefits to the local economy. For example, the power sales from irrigation district hydro project facilities are reinvested into the community, thereby providing local economic benefits.

On August 26, 2015, RMP filed its application with the Commission requesting authority to reduce the contract term in Power Purchase Agreements (“PPAs”) offered to QFs under the Public Utility Regulatory Policies Act of 1978 (“PURPA”) from twenty (20) years down to three (3) years, and to modify the avoided cost methodology regarding the pricing queue for active and newly proposed indicative pricing requests from QFs.

The Renewable Energy Coalition’s legal rights and interests will be substantially affected by this proceeding because RMP’s proposal to reduce the PPA contract terms offered to QFs under PURPA will prevent QFs from selling energy and capacity to RMP pursuant to long-term fixed price contracts. While the Renewable Energy Coalition has not yet determined all of the positions that it may take in this matter, it strongly opposes RMP’s attempt to reduce the maximum term of QF PPAs to three years as contrary to the public interest. The Renewable Energy Coalition seeks to intervene for the purpose of protecting its interests and the interests of its members as they may appear.

The Renewable Energy Coalition has a direct interest in the subject matter to be considered in the above-captioned proceedings, as contemplated by Section 113 of the PSC’s Rules of Practice and Procedure, which interest is not and cannot be adequately protected or represented by any other party.

Intervention by the Renewable Energy Coalition is timely in this docket, and will not unduly broaden the issues in these proceedings. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Renewable Energy Coalition to intervene.

Renewable Energy Coalition will file Comments in this proceeding setting forth specific positions it will take and the relief it will seek. Renewable Energy Coalition seeks to intervene for purposes of protecting its interests as they arise.

If Renewable Energy Coalition's Petition for Leave to Intervene is granted, all notices, pleadings, orders, pre-filed testimony, exhibits, discovery, and all other communications should be served upon the following:

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Motion for Admission *pro hac vice* to be filed

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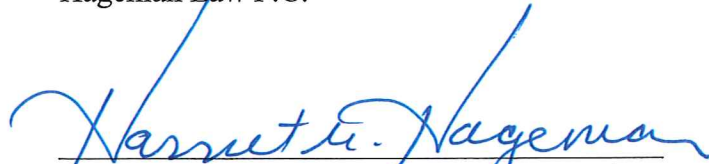
The Renewable Energy Coalition also respectfully requests that this matter be set for a hearing so that the parties may be allowed an adequate and sufficient opportunity to address the issues raised by RMP's Application.

WHEREFORE, Renewable Energy Coalition respectfully requests that the Commission issue an order granting leave to intervene in the above-captioned proceeding as a party, and for all purposes, so as to protect its interests as they may arise. Renewable Energy Coalition also requests

that this matter be set for hearing as per the Commission's August 28, 2015 Notice of Application.

Dated this 28th day of September, 2015.

Respectfully Submitted
Hageman Law P.C.



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **RENEWABLE ENERGY COALITION'S PETITION FOR LEAVE TO INTERVENE AND REQUEST FOR HEARING**, was served by electronic mail on this 28th day of September, 2015 on the following:

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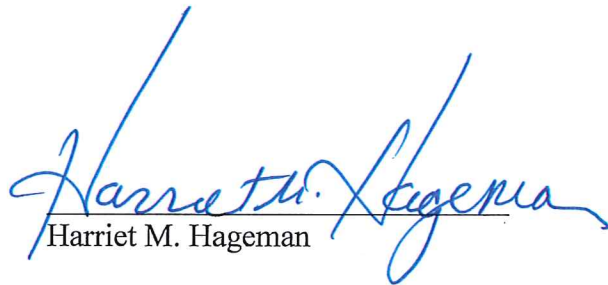
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Docket E-Filing
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