

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)
OF ROCKY MOUNTAIN POWER FOR)
APPROVAL OF SCHEDULE 37 STANDARD) Docket No. 20000-518-EA-17
RATES FOR PURCHASES OF POWER) (Record No. 14736)
FROM 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 June 16, 2017 “Notice of Application,” hereby respectfully files this Petition for Leave to Intervene and Request for Hearing in the above-captioned matter. The Renewable Energy Coalition states and alleges as follows as grounds for this Petition:

The Renewable Energy Coalition was established in 2009, and is comprised of nearly forty members who own and operate over fifty qualifying facilities or are attempting to develop new projects (“QFs”) in Oregon, Idaho, Washington, Utah, Montana and Wyoming. Renewable Energy Coalition’s members have or are seeking power purchase agreements with Northwest and Rocky Mountain electric utilities, including Rocky Mountain Power (“RMP”).

Several types of entities are members of the Renewable Energy Coalition, including irrigation districts, water districts, corporations, and individuals. The vast majority of the individual QFs are small hydroelectric projects less than 7 megawatts many of which are associated with irrigation districts, but the membership includes biomass, solar, geothermal, and waste energy. Most of the Renewable Energy Coalition’s members operate existing projects that have been operating and selling to utilities for numerous years, but several of the members are

developing or planning to develop new projects.

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 and operation of these projects provide numerous environmental or water conservation benefits. For example, the power sales from irrigation district hydro project facilities are reinvested into the community, thereby providing local economic benefits.

On August 31, 2017, RMP filed its application with the Commission requesting authority to revise its tariff Schedule 37, standard rates for purchases of power from QFs. RMP has proposed an avoided cost price of \$31.48 MWh on a 20-year nominal levelized basis for a base load QF, which is a reduction of \$20.67 MWh from current rates. RMP's proposed avoided cost prices are \$25.64 MWh, \$29.65 MWh and \$31.51 MWh on a 20-year nominal levelized basis for a wind, fixed solar, and tracking solar QFs, respectively.

The Renewable Energy Coalition's legal rights and interests will be substantially affected by this proceeding because RMP's proposal to reduce the avoided cost rates offered to QFs under PURPA. The Renewable Energy Coalition actively participates in renewable energy legislation, Public Utility Regulatory Policies Act related proceedings, utility planning processes, and other investigations in the Northwest regarding QFs, including the setting of avoided cost rates.

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 its avoided cost rates. The nature and quantity of any evidence to be presented by the Renewable Energy Coalition in this proceeding is not yet known and the Renewable Energy Coalition reserves the right to participate

as its interests may appear. 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.

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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And, for documents served electronically, please also add:

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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 Notice of Application.

Respectfully submitted this 14th day of July, 2017.

HOLLAND & HART LLP



By: _____
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**Attorneys for
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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 14th day of July 2017 on the following:

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s/ Kayla L. Hall