

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of )  
PacifiCorp for Approval of an IRP-based ) Docket No. 03-035-14  
Avoided Cost Methodology for )  
QF Projects Larger than One Megawatt )

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**PETITION FOR LEAVE TO INTERVENE  
OF WESTERN RESOURCE ADVOCATES AND UTAH CLEAN ENERGY**

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Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), Western Resource Advocates (WRA) and Utah Clean Energy (UCE) hereby petition for leave to intervene in the above-captioned docket and, in support thereof, state as follows:

1. WRA is a regional environmental law and policy center serving the Rocky Mountain states. WRA’s Energy Program promotes energy efficiency, renewable resources, distributed generation, and air pollutant emissions reductions and other measures to help minimize the environmental impacts and the costs and risks to ratepayers of meeting the demand for energy services in an economically and politically acceptable fashion. WRA has a Utah office, a Utah board member, and volunteers and supporters who live in Utah and are PacifiCorp (Company) ratepayers. WRA has participated in Commission proceedings for over 15 years and has been granted intervenor status in multiple Commission dockets.

UCE is a Utah-based public interest group promoting energy efficiency and renewable energy sources. UCE works with a variety of stakeholders including the general public and renewable energy developers.

2. WRA participated in numerous stakeholder meetings leading to the development of PacifiCorp’s 2005 Integrated Resource Plan and provided comments on the IRP. WRA and UCE have been following the progress of the QF case, have attended some of

the stakeholder meetings, and are interested in the treatment of RECs in this case. The treatment of RECs may have significant ramifications for the development of renewable energy resources in Utah.

3. Intervention by WRA and UCE will not unduly broaden the issues or delay the proceeding. To our knowledge no deadline for intervention has been set in this proceeding, and WRA and UCE are filing this petition for intervention prior to the July 11, 2005 deadline for filing intervenor direct testimony.

4. WRA and UCE request that all pleadings, correspondence, discovery, and other documents be served on the following persons:

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Bob Anderson  
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*WHEREFORE*, WRA and UCE request that the Commission grant its petition to intervene.

Respectfully submitted,

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Date: June 20, 2005

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June 2005, copies of the **Petition for Leave to Intervene of Western Resource Advocates and Utah Clean Energy** were sent to the Public Service Commission of Utah and to each of the following via email:

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