

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge)
DOCKET NO. 07-035-93

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

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 jointly 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 and Desert Southwest states. WRA’s Energy Program promotes energy efficiency, renewable resources, distributed generation, advanced power plant technologies, air pollutant emissions reductions and other measures to allow utilities to meet the resource demands of their customers in an environmentally and economically sound manner. WRA has a Utah office, a Utah board member, and members who live in Utah and are PacifiCorp/Rocky Mountain Power ratepayers. WRA has participated in Commission proceedings for over 15 years and has been granted intervenor status in multiple Commission dockets.

2. Utah Clean Energy (UCE) is a state-based non-profit public interest group working to advance energy efficiency and renewable energy, and the economic and environmental benefits those resources provide, in the public policy and utility regulatory arenas in Utah. Through advocacy, education, and diverse partnerships, we advance renewable energy and energy efficiency. The organizational aims of UCE are to increase the use of renewable energy and energy efficiency in Utah and the Western Region; promote policy and regulatory change that drives clean energy development decisions and investments in new energy technologies; provide public education and outreach to increase understanding of the environmental and economic implications of our current electricity portfolio; and to partner with businesses, state and local government, and Utah citizens to support the adoption of clean energy and the efficient use of our energy resources.

3. WRA and UCE have a substantial interest in the above-captioned proceeding. For example, as part of its application, Rocky Mountain Power (RMP) has proposed two rate design mechanisms with which WRA and UCE have an interest. First is a request to diminish the number of blocks in RMP's residential rates. "Block" rates encourage efficiency, and WRA and UCE are interested in the impact RMP's proposal might have on customer end-use efficiency. RMP has also proposed that new, large (10+MW) customers be charged marginal cost for electric service, rather than embedded cost. According to RMP, the marginal cost of serving new loads is substantially greater than embedded cost, and this proposal seems targeted toward rapid large customer growth which seeks to take advantage of RMP's relatively low embedded costs. To the extent this proposal would lessen the uneconomic development of additional loads, and

the corresponding need for new supply-side resources, the concept is of particular interest to WRA and UCE.

4. Intervention by WRA and UCE will not unduly broaden the issues or delay the proceeding. This petition for leave to intervene is timely filed. WRA and UCE do not currently know what evidence, if any, they would present in this proceeding.

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

Steven S. Michel
Western Resource Advocates
2025 Senda de Andres
Santa Fe, NM 87501
505-995-9951
505-690-8733 (mobile)
smichel@westernresources.org

Mike Mendelsohn
Western Resource Advocates
2260 Baseline Rd, Suite 200
Boulder, CO 80302
303-444-1188 x226
mmendelsohn@westernresources.org

Sarah Wright
Executive Director
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84103
801-363-4046
sarah@utahcleanenergy.org

WHEREFORE, WRA and UCE respectfully request that the Commission grant this petition for leave to intervene.

Respectfully submitted,

Steven S. Michel
Energy Program Staff Attorney
Western Resource Advocates
2025 Senda de Andres
Santa Fe, NM 87501

Joro Walker
Utah Office Director
Western Resource Advocates
425 East 100 South
Salt Lake City, Utah 84111

Sarah Wright
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84103

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