## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky	)	
Mountain Power for a Certificate of Public	)	
Convenience and Necessity Authorizing	)	DOCKET NO. 08-035-42
Construction of the Populus-to-Terminal	)	
345 kV Transmission Line Project	)	

## PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission ("Commission"), Western Resource Advocates ("WRA") hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states 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. WRA has a substantial interest in the above-captioned proceeding. In this docket, Rocky Mountain Power seeks a Certificate of Public Convenience and Necessity to construct a 345 kV transmission line between Wyoming and Utah. That line may allow the export of a

variety of resources. The need for that line, the resources it will enable or provide transmission to, and the economics of constructing the line, are of particular interest to WRA. The approval of transmission and generation resources, and whether proposed resources are in fact required by the public convenience and necessity, goes to the core of WRA's interest in promoting environmentally and economically sound resource choices for PacifiCorp and Rocky Mountain Power.

- 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding. WRA's petition for leave to intervene is timely filed. WRA does not currently know what evidence, if any, it would present in any hearings that may occur this proceeding.
- 4. WRA requests 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

Penny Anderson Western Resource Advocates 2260 Baseline Rd, Ste. 200 Boulder CO 80302 penny@westernresources.org

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene.

Respectfully submitted,

Steven S. Michel
Energy Program Senior Staff Attorney
Western Resource Advocates

2025 Senda de Andres Santa Fe, NM 87501

June \_\_\_\_, 2008