BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Request of ROCKY MOUNTAIN POWER for Approval of Significant Energy Resource Decision Resulting from 2012 Request for Proposals

Docket No. 08-035-95

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, Utah board members, 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 approval for a significant new energy resource. That resource is a gas-fired combined-cycle combustion turbine called Lake Side 2. The need for that resource, its economics, and the impact it will have on other RMP resource development are of particular interest to WRA. The approval of generation and other energy resources goes to the core of

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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 during the hearings in this proceeding.

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

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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

January 9, 2009