Gary A. Dodge, #0897 HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, UT 84101 Telephone: 801-363-6363 Facsimile: 801-363-6666 Email: gdodge@hjdlaw.com Attorneys for UAE

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism Docket No. 09-035-15

PETITION TO INTERVENE OF UTAH ASSOCIATION OF ENERGY USERS

Pursuant to Utah Code Ann. § 63-46b-9 and Rule R746-100-7, the Utah Association of

Energy Users (UAE) hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is an organization that represents large Utah electric consumers who are

customers of PacifiCorp or whose rates are affected by PacifiCorp's rate structure.

2. The legal rights and interests of Petitioner and its members may be substantially

affected by this proceeding.

3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for purposes of protecting its interests as they may appear, particularly on issues of relevance to large electric consumers.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

5. Notices in this proceeding should be sent to the following:

Gary A. Dodge HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 Telephone: 801.363.6363 Facsimile: 801.363.6666 Email: gdodge@hjdlaw.com

Kevin Higgins Neal Townsend ENERGY STRATEGIES 39 Market Street, Suite 200 Salt Lake City, UT 84101 Telephone: 801.355.4365 Facsimile: 801.521.9142 E-mail: khiggins@energystrat.com ntownsend@energystrat.com WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its

interests as they may appear.

DATED this 23<sup>rd</sup> day of April, 2009.

HATCH, JAMES & DODGE

/s/ \_\_\_\_\_ Gary A. Dodge Attorneys for UAE

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 23<sup>rd</sup> day of April, 2009, to the following:

Mark C. Moench Yvonne R. Hogle Daniel E. Solander Rocky Mountain Power 201 South Main Street, Suite 2300 Salt Lake City, Utah 84111 mark.moench@pacificorp.com yvonne.hogle@pacificorp.com daniel.solander@pacificorp.com

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/s/ \_\_\_\_\_