

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.	Docket No. 09-035-23 PETITION TO INTERVENE OF WESTERN RESOURCE ADVOCATES
---	---

**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. Rate design proposals can encourage energy efficiency and conservation, as well as the need for, and timing and type of, new resources. By its intervention, WRA intends to address rate design issues that impact utility resource need and development. These are core issues of concerns for WRA.

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 this proceeding.

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

Steven S. Michel
Western Resource Advocates
227 East Palace Avenue, Suite M
Santa Fe, NM 87501
Tel: 505 820-1590
Mobile: 505 690-8733
smichel@westernresources.org

Nancy Kelly
Western Resource Advocates
9463 N. Swallow Rd.
Pocatello, ID 83201
Tel: 208 234-0636
Mobile: 208-339-3636
nkelly@westernresources.org

5. WRA also requests that the following names be added to the electronic service list for this docket:

Steven Michel smichel@westernresources.org
Nancy Kelly: nkelly@westernresources.org
Penny Anderson: penny@westernresources.org

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

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

Steven S. Michel
Energy Program Chief Counsel

227 East Palace Avenue, Suite M
Santa Fe, NM 87501
Tel: 505 820-1590
Mobile: 505 690-8733
smichel@westernresources.org