

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<b>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.</b>	Docket No. 09-035-23  <b>PETITION TO INTERVENE OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT</b>
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**PETITION FOR LEAVE TO INTERVENE  
OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT**

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The Southwest Energy Efficiency Project (“SWEEP”) respectfully petitions for leave to intervene in the above-captioned docket. While this intervention comes at a late date, we respectfully request that SWEEP’s intervention in this docket be granted. We incorrectly understood that there would be a second intervention deadline for parties interested in the second phase of the rate case. In support of the abovementioned intervention SWEEP states as follows:

1. SWEEP is a regional non-profit organization working to advance energy efficiency in six states including Utah. SWEEP partners with utilities and other businesses, state and local government, and other non-profit organizations to promote more efficient use of energy resources. SWEEP has been an active participant in matters related to demand-side management (DSM) policy and program design in Utah. In 2007, SWEEP prepared a report titled *Utah Energy Efficiency Strategy: Policy Options* in response to a request to do so by the Utah Governor’s Office.

2. SWEEP has a substantial interest in the above-captioned proceeding, in particular in the second phase dealing with rate design. Rate design can encourage energy efficiency and conservation, and impact resource planning decisions. By its intervention,

SWEEP intends to address rate design issues that impact energy efficiency and conservation, and will sponsor a witness who is an expert on the topic of rate design and its potential impact on electricity demand.

3. Intervention by SWEEP will not unduly broaden the issues or delay the proceeding. While our intervention is being filed late, our sole interest is in the second phase of the rate case, still to come. SWEEP does not currently know what evidence, if any, it would present in this proceeding.

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

Howard Geller  
Executive Director  
Southwest Energy Efficiency Project (SWEEP)  
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5. SWEEP also requests that the following names be added to the electronic service list for this docket:

Rich Collins ([RCollins@westminstercollege.edu](mailto:RCollins@westminstercollege.edu))

WHEREFORE, SWEEP respectfully requests that the Commission grant its petition for leave to intervene. Respectfully submitted,



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Howard Geller, Executive Director  
Southwest Energy Efficiency Project

October 14, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be emailed a true and correct copy of the foregoing  
PETITION TO INTERVENE OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT this  
14<sup>th</sup> day of January, 2018, to the following:

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