

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**In the Matter of Rocky Mountain Power Advice
No. 09-08, seeking an Adjustment to the DSM
Tariff Rider, Schedule 193.**

**Docket Number: 09-035-T08
PETITION TO INTERVENE OF
SOUTHWEST ENERGY EFFICIENCY
PROJECT (SWEEP)**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), the Southwest Energy Efficiency Project (“SWEEP”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. SWEEP is a regional non-profit public interest group working to advance energy efficiency where cost-effective in six states including Utah. SWEEP has been an active member of Rocky Mountain Power’s (RMP’s) DSM advisory group for the past seven years. In addition, SWEEP was involved in the development of key energy efficiency policies in Utah including the energy efficiency and conservation tariff policy enacted in 2002.

2. SWEEP has interest in this proceeding as DSM is a least cost least risk resource and cost recovery by the utility for their investments is critical to the implementation of effective DSM programs. DSM programs result in demand reduction and RMP does not make a return on their investments in energy efficiency, unlike their investments in supply side resources. The DSM Tariff Rider was designed to provide timely cost recovery to the utility for cost-effective and Commission-approved demand-side resources and it has been successful. Since the adoption of the DSM tariff rider, RMP’s DSM programs have provided significant energy savings and economic benefits to Utah ratepayers. In our view, RMP is entitled to timely cost recovery for prudently incurred expenses associated with implementing DSM programs approved by the Commission.

3. Intervention by SWEEP will not unduly broaden the issues or delay the proceeding. SWEEP’s petition for leave to intervene is timely filed. 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
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2260 Baseline Rd. Suite 212
Boulder, CO 80302
303-447-0078
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WHEREFORE, SWEEP respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Respectfully submitted,

Howard Geller
Executive Director
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Boulder, CO 80302
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 15th day of July, 2009, to the following:

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/s/ _____
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