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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power for Alternative Cost Recovery for Major Plant Additions of the Populous to Ben Lomond Transmission Line and the Dunlap I Wind Project

Docket No. 10-035-89

**PETITION FOR LEAVE TO  
INTERVENE OF THE UTAH  
INDUSTRIAL ENERGY CONSUMERS**

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In accordance with the provisions of Utah Code Ann. § 63G-4-370 and Rule R746-100-7 of the Public Service Commission’s Rules of Practice and Procedure, Holcim, Inc., Kennecott Utah Copper, LLC, Kimberly-Clark Corp., Malt-O-Meal, Praxair, Inc., Proctor & Gamble, Inc., Tesoro Refining and Marketing Co., and Western Zirconium (this group of electrical power customers will be referred to hereinafter, for convenience only, as the “Utah Industrial Energy Consumers” or “UIEC”), hereby petition the Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding, and request that the Commission issue a scheduling order, including a hearing, on this matter.

In support of their Petition to Intervene, the UIEC state as follows:

1. The consumers herein referred to as UIEC are a group of industrial consumers who each take electrical service from Rocky Mountain Power (“RMP” or the “Company”).

2. The UIEC have joined together for the purposes of intervention in this docket to have their common interests represented. The interests of each of the UIEC consumers will not be adequately represented by any other party to this proceeding.

3. The UIEC have a direct, immediate, and substantial interest in this proceeding as customers of Rocky Mountain because the rate they pay for electric service may be affected by a Commission decision in this proceeding.

4. Petitioners seek to intervene in this proceeding for the purpose of raising the issues of (a) allocation to Utah of any amounts allowed by the Commission, (b) allocation to the classes of any amounts allowed by the Commission, (c) the timing of the recovery of the amounts deferred from the last major plant addition case, and (d) the timing of the recovery of any amounts allowed by the Commission in this case.

5. If the UIEC consumers are granted leave to intervene in this proceeding, they hereby request that service of all pleadings, notices, etc. be made to the following:

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6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the UIEC's Petition to Intervene.

7. WHEREFORE, the UIEC request that the Commission enter an Order granting the consumers herein referred to as the UIEC permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 13th day of August, 2010.

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<sup>1</sup> Please note that our email addresses may be modified from what you presently have in your records.

/s/ Vicki M. Baldwin

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F. Robert Reeder  
Vicki M. Baldwin  
PARSONS BEHLE & LATIMER  
Attorneys for UIEC, an Intervention Group

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of August 2010, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION OF THE UTAH INDUSTRIAL ENERGY CONSUMERS FOR LEAVE TO INTERVENE** to:

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/s/ Colette V. Dubois