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 Intervention Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase Its Proposed Electric Service Schedules and Electric service Regulations. Docket No. 11-035-200

PETITION TO INTERVENE OF UTAH ASSOCIATION OF ENERGY USERS INTERVENTION GROUP

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioners Utah

Association of Energy Users, ATK Propulsion Systems, American Pacific Corporation,

Anadarko Midstream, Chevron Global Power, ConocoPhillips Gas and Power, Hexcel

Corporation, Intermountain Healthcare, IM Flash Technologies, LLC, May Foundry & Machine

Company and Simplot Phosphates ("UAE Intervention Group" or "UAE"), hereby petition for

leave to intervene in this docket.

In support of this petition, Petitioners state as follows:

1. Petitioners are large Utah electric consumers who are customers of Rocky Mountain Power or whose rates are affected by Rocky Mountain Power's rate structure, or organizations that represent such consumers.

2. The legal rights and interests of Petitioners may be substantially affected by this proceeding.

3. Petitioners have not fully determined the specific positions they will take or the relief they will seek. Petitioners seek to intervene for purposes of protecting their 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 Petitioners 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 215 S. State Street, #200 Salt Lake City, UT 84111 Telephone: 801-355-4365 Facsimile: 801-521-9142 E-mail: khiggins@energystrat.com ntownsend@energystrat.com

WHEREFORE, Petitioners request leave to intervene in this proceeding to protect their interests as they may appear.

DATED this 7th day of March, 2012.

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 7th day of March, 2012, on 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

Patricia Schmid Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111 pschmid@utah.gov

Paul Proctor Assistant Attorney General 160 East 300 South, 5th Floor Salt Lake City, UT 84111 pproctor@utah.gov

F. Robert Reeder William J. Evans Vicki M. Baldwin Parsons Behle & Latimer One Utah Center, Suite 1800 201 S Main St. Salt Lake City, UT 84111 BobReeder@pblutah.com BEvans@pblutah.com VBaldwin@pblutah.com

Holly Rachel Smith, Esq. Holly Rachel Smith, PLLC Hitt Business Center 3803 Rectortown Road Marshall, VA 20115 (540) 364-0150 holly@raysmithlaw.com Ryan L. Kelly Kelly & Bramwell, P.C. 11576 South State Street Bldg. 1002 Draper, UT 84020 ryan@kellybramwell.com

Steve W. Chriss Wal-Mart Stores, Inc. 2001 SE 10th Street Bentonville, AR 72716-0550 stephen.chriss@wal-mart.com

Kurt J. Boehm, Esq. Jody M. Kyler, Esq. BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 kboehm@BKLlawfirm.com jkyler@BKLlawfirm.com

Brian W. Burnett, Esq. CALLISTER NEBEKER & MCCULLOUGH Zions Bank Building 10 East South Temple, Suite 900 Salt Lake City, Utah 84133 brianburnett@cnmlaw.com

Stephen J. Baron J. Kennedy & Associates 570 Colonial Park Drive, Suite 305 Roswell, GA 30075 sbaron@jkenn.com

Peter J. Mattheis Eric J. Lacey BRICKFIELD, BURCHETTE, RITTS & STONE, P.C. 1025 Thomas Jefferson Street, N.W. 800 West Tower Washington, D.C. 20007 pjm@bbrslaw.com elacey@bbrslaw.com Gerald H. Kinghorn Jeremy R. Cook PARSONS KINGHORNHARRIS, P.C. 111 East Broadway, 11 the Floor Salt Lake City, UT 84111 ghk@pkhlawyers.com jrc@pkhlawyers.com

Roger Swenson US Magnesium LLC 238 North 2200 West Salt Lake City, UT 84114-6751 roger.swenson@prodigy.net

Sophie Hayes Sarah Wright Utah Clean Energy 1014 2nd Avenue Salt Lake City, UT 84111 sophie@utahcleanenergy.org sarah@utahcleanenergy.org Rob Dubuc Western Resource Advocates 150 South 600 East, Suite 2A Salt Lake City, UT 84102 rdubuc@westernresources.org

Steven S. Michel Western Resource Advocates 409 E. Palace Ave. Unit 2 Santa Fe, NM 87501 smichel@westernresources.org

Nancy Kelly Western Resource Advocates 9463 N. Swallow Rd. Pocatello, ID 83201 nkelly@westernresources.org

Betsy Wolf Salt Lake Community Action Program 764 South 200 West Salt Lake City, Utah 84101 bwolf@slcap.org

/s/ _____