

Charles R. Dubuc
Western Resource Advocates
150 S 600 E, Ste 2A
Salt Lake City, UT 84102
801-487-9911
rdubuc@westernresources.org
Attorney for Western Resource Advocates

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. 11-035-200

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 states of the Interior West. 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, three Utah board members, and members who live in Utah and are PacifiCorp/Rocky Mountain Power ratepayers. WRA has participated in Commission

proceedings for over 16 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 energy efficiency and conservation which in turn affect utility resource need and development. In addition, WRA may become involved in other aspects of proceeding, such as of Rocky Mountain Power's requested cost recovery for certain assets and upgrades. These are core issues of concern 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
409 E. Palace Ave. Unit 2
Santa Fe, NM 87501
505-820-1590
smichel@westernresources.org

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

and

Rob Dubuc
Western Resource Advocates
150 South 600 East, Suite 2AB
Salt Lake City, UT 84102
801-487-9911
rdubuc@westernresources.org

5. WRA also requests that the following name be added to the electronic service list for this docket: Penny Anderson (penny.anderson@westernresources.org).

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

Respectfully submitted this 14th day of March 2012,

WESTERN RESOURCE ADVOCATES



Charles R. Dubuc
Staff Attorney
Western Resource Advocates
150 S 600 E, Ste 2A
Salt Lake City, UT 84102
801-487-9911
rdubuc@westernresources.org