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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of the Utah Industrial Energy Consumers for a Deferred Accounting Order Directing Rocky Mountain Power to Defer Incremental REC Revenue for Later Ratemaking Treatment.

Docket No. 11-035-46

**PETITION TO INTERVENE OF
THE UTAH ASSOCIATION OF
ENERGY USERS IN SUPPORT OF
APPLICATION FOR DEFERRED
ACCOUNTING**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Utah Association of Energy Users (“UAE”) hereby petitions for leave to intervene in this docket in support of UIEC’s Application for a Deferred Accounting Order.

In support of this petition, Petitioner states as follows:

1. Petitioner is an association of large Utah electric consumers who are customers of Rocky Mountain Power or whose rates are affected by Rocky Mountain Power's rate structure.

2. The legal rights and interests of Petitioner and its members may be substantially affected by this proceeding.

3. While UAE has not fully determined all of the specific positions it will take or the relief it will seek, UAE intervenes in support of the Application of the Utah Industrial Energy Consumers ("UIEC") in this docket for a deferred accounting order for incremental REC revenue prior to February 22, 2010. UAE concurs with UIEC that these incremental REC revenue were unforeseeable, extraordinary and material, and qualify for deferred accounting under Utah law.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

5. Notices in this proceeding should be sent to the following:

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

DATED this 15th day of April, 2011.

HATCH, JAMES & DODGE

/s/ _____
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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 April, 2011, on the following:

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