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Attorneys for UIEC, an Intervention Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of the Utah Office of Consumer Services for a Deferred Accounting Order Directing Rocky Mountain Power to Defer All bonus Depreciation Allowed for 2010 through 2011 by the Small Business Jobs Act as Amended.

Docket No. 11-035-47

PETITION FOR LEAVE TO INTERVENE OF UIEC, AN INTERVENTION GROUP

In accordance with the provisions of Utah Code Ann. § 63G-4-207 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 Utah Public Service Commission ("Commission") for leave to intervene in the above-referenced proceeding, and request that the Commission issue an order allowing UIEC to participate fully in this matter.

In support of its Petition to Intervene, UIEC states 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 entities that are a part of 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 entities of 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. The consumers herein referred to as the UIEC have not yet determined the level of their participation or the precise nature of the relief the UIEC will seek, but request that the Commission grant the UIEC intervention as their interests may appear.
- 5. If UIEC is granted leave to intervene in this proceeding, it hereby requests 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 UIEC's Petition to Intervene.
- 7. WHEREFORE, UIEC requests that the Commission enter an Order granting UIEC permission to intervene in this docket and to participate to the full extent allowed by the law so that it may appropriately represent its interests as circumstances warrant in this proceeding.

DATED this 3rd day of May, 2011.

/s/ Vicki M. Baldwin

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

4813-9249-9209.1

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May 2011, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION TO INTERVENE OF UIEC, AN INTERVENTION GROUP** to:

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