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

## **BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO REVISE RATES IN TARIFF SCHEDULE 98, RENEWABLE ENERGY CREDITS BALANCING ACCOUNT, BY CREDITING REVENUES OF APPROXIMATELY \$4.0 MILLION Docket No. 12-035-68

PETITION TO INTERVENE OF THE UTAH ASSOCIATION OF ENERGY USERS

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 this petition, Petitioner states as follows:

1. Petitioner is an organization that represents 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. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for purposes of protecting its interests and the interests of its members 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 Petitioner 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 requests leave to intervene in this proceeding to protect its interests

as they may appear

DATED this 6<sup>th</sup> day of April, 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 6<sup>th</sup> day of April, 2012, on the following:

Mark C. Moench Yvonne R. Hogle Rocky Mountain Power 201 South Main Street, Suite 2300 Salt Lake City, Utah 84111 mark.moench@pacificorp.com yvonne.hogle@pacificorp.com

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/s/ \_\_\_\_\_