Travis Ritchie (CA Bar 258084) Gloria D. Smith (CA Bar 200824) Sierra Club 85 Second Street, Second floor San Francisco, CA 94105 (415) 977-5727 travis.ritchie@sierraclub.org gloria.smith@sierraclub.org

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STATE OF UTAH Public Service Commission

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

PETITION TO INTERVENE

Docket No. 13-035-184

SIERRA CLUB

PETITION TO INTERVENE

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Sierra Club, hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Sierra Club petitions to intervene in this proceeding on behalf of itself and its approximately 3,600 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power ("RMP" or the "Company").

- 2. The interests of each of the Sierra Club and its members will not be adequately represented by any other party to this proceeding.
- 3. The legal rights and interests of Sierra Club and its members may be substantially affected by this proceeding.
- 4. Sierra Club has not fully determined the specific positions it will take or the relief it will seek. Sierra Club 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 the public health, environmental, and economic impacts of the Company's proposed actions.
- 5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Sierra Club to intervene.
- 6. Notices in this proceeding should be sent to the following:

Travis Ritchie, Staff Attorney Gloria D. Smith, Senior Attorney Sierra Club 85 Second Street, Second floor San Francisco, CA 94105 (415) 977-5727 (415) 977-5532 travis.ritchie@sierraclub.org gloria.smith@sierraclub.org

David Wooley Keyes, Fox & Wiedman LLP 436 14th Street Suite 1305 Oakland, California 94612 (510) 314-8200 dwooley@kfwlaw.com WHEREFORE, Sierra Club requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

DATED this 31st day of January, 2014

Respectfully submitted,

Original Signed by:

Travis Ritchie, Staff Attorney Gloria D. Smith, Senior Attorney Sierra Club 85 Second Street, Second floor San Francisco, CA 94105 (415) 977-5727 (415) 977-5532 travis.ritchie@sierraclub.org gloria.smith@sierraclub.org

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