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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF ROCKY
MOUNTAIN POWER'S 2015
INTEGRATED RESOURCE PLAN**

Docket No. 15-035-04

**PETITION TO INTERVENE OF
THE POWDER RIVER BASIN
RESOURCE COUNCIL**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, the Powder River Basin Resource Council (“Resource Council”) respectfully petitions for leave to intervene in this docket.

In support of this petition, the Resource Council states as follows:

1. The Resource Council is a membership-based grassroots organization with headquarters in Sheridan, Wyoming. It was formed in 1973 by ranchers and concerned citizens to address the impacts of mineral development on rural people and communities. The Resource Council’s mission is to work for the preservation and enrichment of our agricultural heritage and rural lifestyle; the conservation of our unique land, mineral, water, and clean air resources, consistent with the responsible use of those resources to sustain the livelihood of present and future generations; and the education and empowerment of our citizens to raise a coherent voice in the decisions that will impact their environment and lifestyle.

2. The Resource Council has over 1,000 members, and a substantial number of members live and work in areas served by Rocky Mountain Power. These members have an

interest in the outcomes of the IRP process, including any decisions made about infrastructure investments by the company.

3. Additionally, the Resource Council has been heavily involved in the Environmental Protection Agency's ("EPA") approval of Best Available Retrofit Technology ("BART") Permits for Rocky Mountain Power plants, including Wyodak, Dave Johnston, and Naughton, as well as EPA's proposed Section 111(d) carbon reduction standards. Decisions made by the Commission regarding the IRP have the potential to impact Rocky Mountain Power's ability to implement air pollution control technology or other aspects of EPA's regulations.

4. The Resource Council also seeks intervention before the Commission in this proceeding regarding the IRP because it is the only effective means to protect our legal rights and interests. PacifiCorp/Rocky Mountain Power is claiming that much of the technical and financial information required to formulate and evaluate this IRP is confidential. In order to access this confidential information and be able to discuss that information with allied organizations, the Resource Council must intervene in this docket. The Resource Council is petitioning to intervene before the Commission so that we may sign the Utah confidentiality agreement and effectively engage in the IRP development process.

5. Granting the Resource Council intervention will not materially impair the interests of justice and the orderly and prompt conduct of this proceeding. The Resource Council understands that a scheduling order has been established for this docket and agrees to abide by its terms.

6. The Resource Council is not adequately represented by current parties to this docket.

7. The Resource Council has not fully determined the specific positions it will take or the relief it will seek. However, in general the Resource Council seeks to intervene in these proceedings to ensure that expenditures proposed in the 2015 IRP are prudently justified, that they properly assess future cost risk related to increased environmental regulation of coal mining and coal-fired power plants, and that they are the least cost/least risk options to meet environmental requirements.

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

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Shannon Anderson is a full-time staff member of the Resource Council and is therefore authorized to represent the Resource Council pursuant to Rule R746-100-6(b).

WHEREFORE, the Powder River Basin Resource Council requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 24th day of April 2015.

/s/ Shannon Anderson
Shannon Anderson
Powder River Basin Resource Council

CERTIFICATE OF SERVICE
Docket No. 15-035-04

I hereby certify that a true and correct copy of the foregoing was served by email this 24th day of April, 2015 on the following:

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/s/ _____ Shannon Anderson