

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**In the Matter of a Request for Agency
Action to Review the Carrying Charges
Applied to Various Rocky Mountain Power
Account Balances**

DOCKET NO. 15-035-69

**PETITION FOR LEAVE TO INTERVENE OF
SOUTHWEST ENERGY EFFICIENCY PROJECT**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Southwest Energy Efficiency Project petitions for leave to intervene in this docket. In support of this petition, Southwest Energy Efficiency Project states as follows:

1. The Southwest Energy Efficiency Project is a not-for-profit public interest organization dedicated to advancing energy efficiency in a six-state region that includes Utah, Arizona, Colorado, Nevada, New Mexico, and Wyoming. The Southwest Energy Efficiency Project has been active in Utah energy regulatory matters since its founding in 2001.

2. The Southwest Energy Efficiency Project considers utility demand-side management (DSM) programs to be an important energy resource, which provide economic, environmental, and security benefits to Utah businesses and residents.

3. On August 11, 2015 the Division of Public Utilities (the Division) filed a request for agency action requesting that the Public Service Commission of Utah (the Commission) open a docket to review and possibly modify the annual carrying charge on various Rocky Mountain Power (Company) accounts within various Company tariffs.

4. The Southwest Energy Efficiency Project has a substantial interest in the above-captioned proceeding. This proceeding will determine the carrying charge applied to the

Company's DSM balancing account (among other accounts). As an advocacy organization for demand-side management programs in the Southwestern states, Southwest Energy Efficiency Project's legal rights and interests may be substantially affected by this proceeding.

5. Intervention by Southwest Energy Efficiency Project will not unduly broaden the issues or delay the proceeding. This petition for leave to intervene is timely filed. Southwest Energy Efficiency Project does not currently know what evidence or specific positions it may present in this proceeding. Southwest Energy Efficiency Project seeks to intervene for purposes of protecting its interests as they arise.

7. Southwest Energy Efficiency Project's interests are not adequately represented by another party in this proceeding.

8. If granted leave to intervene in this proceeding, Southwest Energy Efficiency Project request that all notices, pleadings, correspondence, discovery and other documents be sent to the following:

Howard Geller
Southwest Energy Efficiency Project
2334 Broadway, Suite A
Boulder, CO 80304
720-939-8333
hgeller@swnenergy.org

WHEREFORE, Southwest Energy Efficiency Project respectfully requests that the Commission grant this petition for leave to intervene.

DATED this 19th day of November, 2015.

Respectfully submitted,

A handwritten signature in black ink that reads "Howard Geller". The signature is written in a cursive style with a large, prominent 'H' and 'G'.

Howard Geller
Executive Director
Southwest Energy Efficiency Project
2334 Broadway, Suite A
Boulder, CO 80304
720-939-8333
hgeller@swenergy.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 19th day of November, 2015 on the following:

ROCKY MOUNTAIN POWER:

Robert C. Lively	bob.lively@pacificorp.com
Michael S. Snow	michael.snow@pacificorp.com
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/s/ Sophie Hayes