

Sophie Hayes (12546)
Utah Clean Energy
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Attorney for Utah Clean Energy

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

1. Utah Clean Energy is a state-based, non-profit, public interest organization working to create healthy, thriving communities, empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on preventing wasted energy, facilitating clean energy and creating a smart energy future.

2. 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 (Commission) open a docket to review and possibly modify the annual carrying charge on various Rocky Mountain Power (Company) accounts within various Company tariffs.

3. As an advocate for energy efficiency and conservation, including utility demand-side management (DSM) programs, Utah Clean Energy's legal rights and interests may be substantially affected by this proceeding, which will determine the carrying charges applicable to the DSM balancing account (among other things).

4. Utah Clean Energy has not fully determined specific positions it will take or the relief it will seek. Utah Clean Energy seeks to intervene for purposes of protecting its interests as they arise.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Utah Clean Energy to intervene.

6. Utah Clean Energy's interests are not adequately represented by another party in this proceeding.

7. If Utah Clean Energy is granted leave to intervene in this proceeding, notices should be sent to the following:

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WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 19th day of November, 2015.

Respectfully submitted,

/s/ _____

Sophie Hayes

Counsel for Utah Clean Energy

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
Daniel. E. Solander	daniel.solander@pacificorp.com

DIVISION OF PUBLIC UTILITIES:

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/s/ Sophie Hayes