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Attorneys for UAE

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO DECREASE THE DEFERRED EBA RATE THROUGH THE ENERGY BALANCING

ACCOUNT MECHANISM

Docket No. 16-035-01

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 ("Petitioner" or 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:

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2

WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 6th day of May 2016.

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 6th day of May 2016 on the following:

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/s/ _____