Gary A. Dodge, #0897 Phillip J. Russell, #10445 HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, UT 84101 Telephone: 801-363-6363 Facsimile: 801-363-6666 Email: gdodge@hjdlaw.com Attorneys for UAE

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Implement Programs Authorized by the Sustainable Transportation and Energy Plan Act

Docket No. 16-035-36

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:

Gary A. Dodge Phillip J. Russell HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 Telephone: 801.363.6363 Facsimile: 801.363.6666 Email: gdodge@hjdlaw.com prussell@hjdlaw.com

Kevin Higgins Neal Townsend ENERGY STRATEGIES 215 S. State Street, #200 Salt Lake City, UT 84111 Telephone: 801-355-4365 Facsimile: 801-521-9142 E-mail: khiggins@energystrat.com ntownsend@energystrat.com

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

DATED this 15th day of November, 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 15th day of November 2016, on the following:

Rocky Mountain Power: Jeff Richards Dan Solander Jeff Larsen Bob Lively	robert.richard@pacificorp.com daniel.solander@pacificorp.com jeff.larsen@pacificorp.com bob.lively@pacificorp.com
Division of Public Utilities: Patricia Schmid Justin Jetter Chris Parker Artie Powell Erika Tedder	pschmid@utah.gov jjetter@utah.gov chrisparker@utah.gov wpowell@utah.gov etedder@utah.gov
Office of Consumer Services: Rex Olsen Robert Moore Michele Beck Cheryl Murray	rolsen@utah.gov rmoore@utah.gov mbeck@utah.gov cmurray@utah.gov
Utah Clean Energy: Sophie Hayes Sarah Wright Mitalee Gupta	sophie@utahcleanenergy.org sarah@utahcleanenergy.org mgupta@utahcleanenergy.org
Sierra Club: Gloria Smith Travis Ritchie Joseph Halso	gloria.smith@sierraclub.org travis.ritchie@sierraclub.org joe.halso@sierraclub.org
Western Resource Advocates Jennifer Gardner Nancy Kelly Penny Anderson	jennifer.gardner@westernresources.org nancy.kelly@westernresources.org penny.anderson@westernresources.org

/s/_____