## **BEFORE THE**

## PUBLIC SERVICE COMMISSION OF UTAH

	\$ \$ \$ \$	
In The Matter of The Application of Questar Gas Company to Increase Distribution Non-	\$ \$	Docket No. 090-057-16
Gas Rates and Charges and Make Tariff Modifications	\$ \$ \$ \$	PETITION TO INTERVENE OF AARP

Pursuant to Utah Code § 63-46b-9, AARP ("Petitioner") hereby petitions the Public Service Commission of Utah ("Commission") for leave to intervene and participate in the above referenced proceeding.

In support of this Petition, AARP states as follows:

 Petitioner is a nonprofit, non partisan membership organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.<sup>1</sup> AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are more than 220,000 AARP members currently residing in the state of Utah, many of whom are Questar customers.

<sup>&</sup>lt;sup>1</sup> In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

- 2. AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service is one of these priority issues.
- 3. Correspondence, communications, orders and the decision in this matter should be addressed to:

Bruce Plenk Law Office of Bruce Plenk 2958 N St Augustine Pl Tucson, AZ 85712 Ph: 520 795-8611 E-mail: bplenk@igc.org

Janee Briesemeister AARP 98 San Jacinto Blvd. Ste. 750 Austin, TX 78701 Ph: (512) 480-2426 E-mail: jbriesemeister@aarp.org

On December 29, 2009, the Commission issued an Order directing interested parties to intervene to do so by March 1, 2010. This petition is therefore timely.

4. AARP has a long track record of professional participation before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP has provided credible and persuasive testimony, assisting commissioners in crafting just and reasonable decisions on issues regarding rates and services for older utility consumers.

5. AARP's interest in this matter relates to the proposed rates, terms and conditions of for Questar's residential gas customers. More specifically, AARP's interest in this matter relates to how these proposals may directly and adversely impact those ratepayers aged 50 and older who are receiving gas service from Questar. This interest is different than the

general public interest. Older consumers are particularly vulnerable to increases in energy prices. They also devote a higher percentage of their total spending than do other age groups on residential energy costs. Older consumers also have special needs with regard to access to heating.

6. The rate increase requested by the Applicant, if approved, would result in significant added cost to AARP's members and other ratepayers aged 50 and over. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

WHEREFORE, for the reasons set forth above, AARP requests that the Public Service Commission of Utah grant this timely Motion to Intervene and permit AARP to participate in this proceeding with full rights as a party.

DATED this 28th day of January, 2010.

Respectfully submitted,

\_/s\_\_

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## **CERTI FICATE OF SERVICE**

I hereby certify that on this 29th day of January 2010, I caused to be e-mailed and/or

mailed, first class, postage prepaid, a true and correct copy of the foregoing PETITION TO

INTERVENE OF AARP, to:

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