

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<b>In the Matter of:</b> The Application of Questar Gas Company for Authority to Increase its Retail Gas Utility Service Rates in Utah and for Approval of Its Proposed Gas Service Schedules and Gas Service Regulations	Docket No. 09-057-16
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**PETITION FOR LEAVE TO INTERVENE  
OF SOUTHWEST ENERGY EFFICIENCY PROJECT  
AND UTAH CLEAN ENERGY**

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Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), the Southwest Energy Efficiency Project (SWEEP) and Utah Clean Energy (UCE) hereby petition for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. SWEEP is a regional non-profit organization working to advance energy efficiency in six states including Utah. SWEEP partners with utilities and other businesses, state and local government, and other non-profit organizations to promote more efficient use of energy resources. SWEEP has been an active participant in matters related to demand-side management (DSM) policy and program design in Utah. In 2007, SWEEP prepared a report titled *Utah Energy Efficiency Strategy: Policy Options* in response to a request to do so by the Utah Governor’s Office.

2. Utah Clean Energy (UCE) is a state-based non-profit public interest group working to advance energy efficiency and renewable energy, and the economic and environmental benefits those resources provide, in the public policy and utility regulatory arenas in Utah. Through advocacy, education, and diverse partnerships, we advance renewable energy and energy efficiency. The organizational aims of UCE are to increase the use of renewable energy and energy efficiency in Utah and the Western Region; promote policy and regulatory change that drives clean energy development decisions and investments in new energy

technologies; provide public education and outreach to increase understanding of the environmental and economic implications of our current electricity portfolio; and to partner with businesses, state and local government, and Utah citizens to support the adoption of clean energy and the efficient use of our energy resources.

3. SWEEP and UCE have a substantial interest in the above-captioned proceeding. The continuation of natural gas energy efficiency programs and the long-term energy savings associated with those programs is a core issue for both SWEEP and UCE. In this proceeding, Questar Gas Company seeks approval for permanent continuation of the three-year pilot phase of its Conservation Enabling Tariff and associated comprehensive demand-side management program. By its intervention, SWEEP and UCE intend to examine and address the issues in this case with the goal of promoting an effective, robust, and long-term natural gas demand-side management program in Utah.

4. Intervention by SWEEP and UCE will not unduly broaden the issues or delay the proceeding. This petition for leave to intervene is timely filed. SWEEP and UCE do not currently know what evidence, if any, it would present in this proceeding.

5. SWEEP and UCE request that all pleadings, correspondence, discovery and other documents be served on the following:

Howard Geller, Executive Director  
Southwest Energy Efficiency Project (SWEEP)  
2260 Baseline Rd. Suite 212  
Boulder, CO 80302  
303-447-0078  
[hgeller@swenergy.org](mailto:hgeller@swenergy.org)

Sarah Wright, Executive Director  
Utah Clean Energy  
1014 2nd Avenue  
Salt Lake City, UT 84103  
801-363-4046  
[sarah@utahcleanenergy.org](mailto:sarah@utahcleanenergy.org)

6. SWEEP and UCE also request that the following names be added to the electronic service list for this docket:

Kevin Emerson ([kevin@utahcleanenergy.org](mailto:kevin@utahcleanenergy.org))  
Brandy Smith ([brandy@utahcleanenergy.org](mailto:brandy@utahcleanenergy.org))

WHEREFORE, SWEEP and UCE respectfully request that the Commission grant its petition for leave to intervene.

Respectfully submitted,



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Howard Geller, Executive Director  
Southwest Energy Efficiency Project



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Sarah Wright, Executive Director  
Utah Clean Energy

February 9, 2010