

Virgin Islands. There are more than 217,000 AARP members currently residing in the state of Utah, many of whom are customers of Rocky Mountain Power.

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.

Correspondence, communications, orders and the decision in this matter should be addressed to:

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2. On December 27, 2007, the Commission issued an Order directing interested parties wishing to intervene, except for those desiring to raise issues associated with the test year, to do so by February 1, 2008, and thus, this application is timely.

3. 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.

4. AARP's interest in this matter relates to the proposed rates, terms and conditions of service for Rocky Mountain Power's residential electric 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 service from Rocky Mountain Power. 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 and cooling.

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 31st day of January, 2008.

Respectfully submitted,

_____/s/_____
Dale F. Gardiner
Attorney for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2008, 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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