BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Request of ROCKY MOUNTAIN POWER for Waiver of Solicitation Process and for Approval of Significant Energy Resource Decision

Docket No. 08-035-35

PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES AND UTAH CLEAN ENERGY

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission ("Commission"), Western Resource Advocates ("WRA") and Utah Clean Energy ("UCE") hereby jointly petition for leave to intervene in the above-captioned docket and, in support thereof, state as follows:

1. WRA is a regional environmental law and policy center serving the Rocky Mountain and Desert Southwest states. WRA's Energy Program promotes energy efficiency, renewable resources, distributed generation, advanced power plant technologies, air pollutant emissions reductions and other measures to allow utilities to meet the resource demands of their customers in an environmentally and economically sound manner. WRA has a Utah office, a Utah board member, and members who live in Utah and are PacifiCorp/Rocky Mountain Power ratepayers. WRA has participated in Commission proceedings for over 15 years and has been granted intervenor status in multiple Commission dockets.

- 2. Utah Clean Energy 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, UCE advances 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 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. WRA and UCE have a substantial interest in the above-captioned proceeding. In this docket, PacifiCorp seeks approval of a new significant energy resource, without the need for a solicitation process. The nature of that resource has not been disclosed, yet the procurement of energy resources goes to the core of WRA's and UCE's interest in promoting environmentally and economically sound resource choices for PacifiCorp and Rocky Mountain Power.
- 4. Intervention by WRA and UCE will not unduly broaden the issues or delay the proceeding. WRA's petition for leave to intervene is timely filed. WRA and UCE do not currently know what evidence, if any, they would present in any hearings that may occur in this proceeding.
- 5. WRA and UCE request that all pleadings, correspondence, discovery and other documents be served on the following:

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

Respectfully submitted,

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April _____, 2008

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