

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism	Docket No. 09-035-15 PETITION TO INTERVENE OF WESTERN RESOURCE ADVOCATES
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Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states 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. WRA has a substantial interest in the above-captioned proceeding. Rocky Mountain Power’s (RMP) proposed Energy Cost Adjustment Mechanism (ECAM) would allow the utility to periodically adjust its rates to recover fuel and purchased power costs it incurs that are greater or less than amounts in its base rates. This type of proposal can change the risks and incentives of utilities, and can do so in a manner that affects renewable energy and energy efficiency

resource procurement. One advantage renewables and efficiency have over fossil-fueled generation is the absence of fuel price risk. Eliminating that risk from RMP shareholders, as RMP's proposal may do, is therefore of concern to WRA. By its intervention, WRA intends to address this issue as well as others that may affect the resources RMP uses to provide power to its customers.

3. Intervention by WRA will not unduly broaden the issues or delay the proceeding. WRA's petition for leave to intervene is timely filed. WRA does not currently know what evidence, if any, it would present in this proceeding.

4. WRA requests that all pleadings, correspondence, discovery and other documents be served on the following:

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5. WRA also requests that the following names be added to the electronic service list for this docket:

Steven Michel smichel@westernresources.org

Nancy Kelly: nkelly@westernresources.org
Penny Anderson: penny@westernresources.org

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

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