

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 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”), Utah Clean Energy (“UCE”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. Utah Clean Energy (UCE) is a state-based non-profit public interest group working to build the new clean energy economy through advancing energy efficiency and renewable energy, and promoting the economic and environmental benefits that those resources provide. The organizational aims of UCE include finding innovative solutions that increase the use of renewable energy and energy efficiency in Utah and the Western Region to create a more diverse energy portfolio that will reduce greenhouse gas emissions and associated risks, fuel volatility, and air pollution while considering the long term impacts of our current energy decisions.
2. UCE has interest in this proceeding as 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 has the potential to affect the degree to which renewable energy and energy efficiency resources are planned and procured in the RMP service territory. Renewable energy and energy efficiency have the potential to reduce the volatility and risks associated with fuel prices. Reducing or eliminating that risk from RMP shareholders, as RMP’s proposal may do, is therefore of concern to UCE. By its intervention, UCE 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 UCE will not unduly broaden the issues or delay the proceeding. UCE's petition for leave to intervene is timely filed. UCE does not currently know what evidence, if any, it would present in this proceeding.

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

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

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

Sarah Wright, sarah@utahcleanenergy.org
Kevin Emerson, kevin@utahcleanenergy.org
Brandy Smith, brandy@utahcleanenergy.org

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

Respectfully submitted,

Utah Clean Energy

Sarah Wright
Executive Director

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Salt Lake City, UT 84103
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