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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Natural Gas Price Risk Management Policies and Procedures of Rocky Mountain Power.

Docket No. 09-035-21

**PETITION TO INTERVENE OF THE
UTAH INDUSTRIAL ENERGY
CONSUMERS**

In accordance with Rule 746-100-7 of the Public Service Commission’s Rules of Practice and Procedure and the Provisions of Utah Code Ann. § 63-46b-9, Holcim, Inc., Kennecott Utah Copper Corp., Kimberly-Clark Corp., Malt-O-Meal, Praxair, Inc., Proctor & Gamble, Inc., Tesoro Refining and Marketing Co., and Western Zirconium (this group of electrical power customers will be referred to hereinafter, for convenience only, as the “Utah Industrial Energy Consumers” or “UIEC”), hereby petition the Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding.

In support of this Petition to Intervene, the UIEC state as follows:

1. On April 9, 2009, PacifiCorp (d.b.a. Rocky Mountain Power Company) (“Rocky Mountain”) filed a request with the Commission for a study of its natural gas price risk management policies and procedures.

2. The consumers herein referred to as UIEC are a group of industrial consumers who each take electrical service from Rocky Mountain.

3. The consumers herein referred to as UIEC have joined together for the purposes of intervention in this docket to have their common interests represented. The interests of each of the UIEC consumers will not be adequately represented by any other party to this proceeding.

4. The consumers herein referred to as UIEC have a direct, immediate, and substantial interest in this proceeding as customers of Rocky Mountain because the rate they pay for electric service may be affected by a Commission decision regarding Rocky Mountain’s natural gas price risk management policies and procedures.

6. If the consumers herein referred to as UIEC are granted leave to intervene in this proceeding, they hereby request that service of all pleadings, notices, etc. be made to the following:

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7. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the UIEC’s Petition to Intervene.

8. The consumers herein referred to as the UIEC have not yet determined the level of their participation or the precise nature of the relief the UIEC will seek, but request that the Commission grant the UIEC intervention as their interests may appear.

WHEREFORE, the UIEC request that the Commission enter an Order granting the consumers herein referred to as the UIEC permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 24th day of April, 2009.

/s/ Vicki M. Baldwin

F. ROBERT REEDER
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CERTIFICATE OF SERVICE

(Docket No. 09-035-21)

I hereby certify that on this 24th day of April 2009, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS** to:

<p>Michael Ginsberg Patricia Schmidt ASSISTANT ATTORNEYS GENERAL 500 Heber Wells Building 160 East 300 South Salt Lake City, UT 84111 mginsberg@utah.gov pschmid@utah.gov</p>	<p>Michele Beck Executive Director COMMITTEE OF CONSUMER SERVICES 500 Heber Wells Building 160 East 300 South, 2nd Floor Salt Lake City, UT 84111 mbeck@utah.gov</p>	<p>Yvonne R. Hogle Daniel Solander Jeff Larsen Mark Moench Senior Counsel ROCKY MOUNTAIN POWER 201 South Main Street, Suite 2300 Salt Lake City, UT 84111 yvonne.hogle@pacificorp.com Daniel.solander@pacificorp.com jeff.larsen@pacificorp.com Mark.moench@pacificorp.com datarequest@pacificorp.com</p>
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/s/ Colette V. Dubois
