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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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**In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations**

**Docket No. 09-035-23**

**JOINDER OF UTAH  
ASSOCIATION OF ENERGY  
USERS IN UIEC'S MOTION TO  
BIFURCATE**

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The UAE Intervention Group ("UAE") hereby joins in the "Motion of the Utah Industrial Energy Consumers to Bifurcate Proceedings" filed in this docket on July 8, 2009. In support of this joinder, UAE represents as follows:

UAE agrees with UIEC (and others) that the Company's cost of service methodology and input data are subject to a number of serious concerns and questions, some of which are currently being discussed in a cost of service working group formed as part of a stipulation settling the cost of service phase of the last rate case. Serious time and effort may be required by intervenors and

the Commission to flesh out and resolve all of the complicated cost of service and rate design issues that may be raised in this docket. The parties should be given sufficient time to deal effectively with these issues.

The Commission has bifurcated the cost of service/rate design phases of the last several general rate cases, presumably in consideration of the serious time constraints imposed by statute on resolution of the revenue requirement phase of the case. Given the contemporaneous ECAM, DSM and other significant issues to be dealt with by the parties and the Commission throughout 2009, it makes sense to defer to a slightly later time the resolution of complicated issues that do not carry a statutory time clock.

Wherefore, UAE joins in UIEC's request to bifurcate the cost of service/rate design phase of this docket from the other aspects of this case. UAE respectfully requests that the cost of service/rate design phase be scheduled in a manner convenient to the parties and the Commission but in advance of the peak summer period of 2010.

DATED this 23<sup>rd</sup> day of July, 2009.

HATCH, JAMES & DODGE

/s/ \_\_\_\_\_  
Gary A. Dodge  
Attorneys for UAE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 27<sup>th</sup> day of July, 2009, to the following:

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