

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power Advice No. 09-08, seeking an Adjustment to the DSM Tariff Rider, Schedule 193.	Docket Number: 09-035-T08 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 DSM is a least cost least risk resource and cost recovery by the utility for their investments is critical to the success of DSM programs. DSM programs result in demand reduction and RMP does not make a return on their investments in energy efficiency, as is the case for their investments in supply side resources. The DSM Tariff Rider was designed to provide cost recovery to the utility for demand side resources and it has been successful, since the adoption of the DSM tariff rider RMP’s DSM programs have provided significant energy savings to Utah ratepayers. Furthermore, energy efficiency reduces the risks associated with volatile fuel prices and carbon regulation and utilities should not be penalized for procuring this least cost least risk resource. There may be other cost recovery mechanisms for the utility that would be appropriate for future DSM investments and Utah Clean Energy is open to exploring options.

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

/s/ _____

Sarah Wright
Executive Director

1014 2nd Avenue
Salt Lake City, UT 84103
801-363-4046
sarah@utahcleanenergy.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 1st day of July, 2009, to the following:

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/s/ _____
Sarah Wright