

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of Rocky Mountain Power  
Advice No. 09-08, seeking an Adjustment to the  
DSM Tariff Rider, Schedule 193.

Docket No. 09-035-T08

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**PETITION FOR LEAVE 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, three Utah board members, and members who live in Utah and are PacifiCorp/Rocky Mountain Power customers. 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. The provision of energy efficiency programs and the economics surrounding those programs is a core issue for WRA. In this proceeding, Rocky Mountain Power seeks to substantially increase its recovery of demand-side management costs. Several parties have raised significant issues surrounding that cost recovery proposal. By its intervention, WRA intends to examine and address the issues in this case with the goal of promoting an effective, robust and sustainable demand-side management program for Rocky Mountain Power.

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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2260 Baseline Rd, Suite 200  
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5. WRA also requests that the following names be added to the electronic service list for this docket:

Nancy Kelly (nkelly@westernresources.org)  
Penny Anderson (penny@westernresources.org)

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

Respectfully submitted,

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Steven S. Michel  
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July 15, 2009