

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF UTAH**

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. 10-035-124
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**PETITION TO INTERVENE OF AARP**

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Pursuant to Utah Code § 63-46b-9, AARP (“Petitioner”) hereby petitions the Public Service Commission of Utah (“Commission”) for leave to intervene and participate in the above referenced proceeding.

In support of this Petition, AARP states as follows:

1. Petitioner is a nonprofit, non partisan organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.<sup>1</sup> AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. Many Utah AARP members are customers of Rocky Mountain Power (RMP).

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<sup>1</sup> In 1999, the “American Association of Retired Persons” changed its name to simply “AARP”, in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

2. AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service is one of these priority issues.

3. Correspondence, communications, orders and the decision in this matter should be addressed to:

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On February 23, 2011, the Commission issued an Order directing interested parties wishing to intervene to do so by March 31, 2011. This petition is therefore timely.

4. AARP has a long track record of competent and informed advocacy before public utility commissions throughout the country, including the Public Service Commission of Utah, helping to provide a competent and substantial factual record in numerous cases. AARP has provided credible and persuasive testimony, assisting commissioners in crafting just and reasonable decisions on issues regarding rates and services for older utility consumers.

5. AARP's interest in this matter relates to the proposed rates, terms and conditions of service for Rocky Mountain Power's residential electric customers. More specifically, AARP's interest in this matter relates to how these proposals may directly and adversely impact those ratepayers aged 50 and older who are receiving electric service from RMP. This interest is

different than the general public interest. Older consumers are particularly vulnerable to increases in energy prices. They also devote a higher percentage of their total spending than do other age groups on residential energy costs. Older consumers are also more likely to have fixed incomes and are especially vulnerable to fixed utility charges they cannot control.

6. The rate increase requested by the Applicant, if approved, would result in significant added cost to AARP's members and other ratepayers aged 50 and over. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

WHEREFORE, for the reasons set forth above, AARP requests that the Public Service Commission of Utah grant this timely Motion to Intervene and permit AARP to participate in this proceeding with full rights as a party.

DATED this 24th day of March, 2011.

Respectfully submitted,

\_\_\_\_\_/s.\_\_\_\_\_  
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Attorney for Petitioner AARP

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of March, 2011, I caused to be e-mailed a true and correct copy of the foregoing PETITION TO INTERVENE OF AARP, to:

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\_\_\_\_\_/s/\_\_\_\_Bruce Plenk\_\_\_\_\_