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Counsel for The Federal Executive Agencies (FEA)

**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
)	PETITION FOR LEAVE TO INTERVENE ON BEHALF OF THE FEDERAL EXECUTIVE AGENCIES

In accordance with the provisions of Utah Code Ann. § 63G-4-207 and Rule R746-100-7 of the Public Service Commission's Rules of Practice and Procedure, The Federal Executive Agencies (FEA), hereby petition the Utah Public Service Commission for leave to intervene in the above-references proceeding, and request that the Commission allow the FEA to participate fully in this matter.

In support thereof, the FEA states as follows:

1. In accordance with Docket No. 10-035-124, on January 24, 2011, Rocky Mountain Power, filed an application for approval of its proposed electric service schedules and electric service regulations.

2. The FEA operates several facilities within Utah, specifically Hill Air Force Base, which receive service from Rocky Mountain Power. The rate increase requested by the Applicant, if approved, would result in significant additional costs to the FEA.

3. The rates paid by the FEA for electric service are likely to be significantly affected by the outcome of this proceeding.

4. The FEA has a direct interest in the outcome of this proceeding. At this point in the process, the FEA have not yet formulated what positions, if any, it will take regarding this filing.

5. There is no other party who can adequately represent the FEA's interests, due to the unique status of the Federal government.

6. That FEA has a substantial interest in this proceeding and its inclusion would promote the interests of justice.

Wherefore, the FEA requests that the Commission grant the FEA permission to intervene in this docket and to participate to the full extent allowed by the law so that it may appropriately represent its interests as circumstances warrant in this proceeding. Ms. Karen White has a pending motion for pro hac vice with the Utah State Bar. The FEA requests that the following attorneys be added to the service list in this proceeding:

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of February 2011, I mailed the original and five (5) copies to the Utah Public Service Commission and e-mailed to the following parties, a true and correct copy of the foregoing **NOTICE OF APPEARANCE OF ATTORNEY LICENSED IN A FOREIGN STATE FOR INTERVENOR, THE FEDERAL EXECUTIVE AGENCIES (FEA); PETITION FOR LEAVE TO INTERVENE ON BEHALF OF THE FEA; and MOTION AND CONSENT OF SPONSORING LOCAL COUNSEL FOR PRO HAC VICE ADMISSION OF FEDERAL EXECUTIVE AGENCIES (FEA) OUT OF STATE COUNSEL, KAREN S. WHITE:**

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