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*Attorneys for Western Resource Advocates*

**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. 10-035-124
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**PETITION FOR LEAVE TO INTERVENE  
OF WESTERN RESOURCE ADVOCATES**

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Pursuant to Utah Admin. Code R746-100-7 and Utah Code Ann. § 63G-4-207, Western Resource Advocates (WRA) hereby petitions the Utah Public Service Commission (Commission) 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 states of the Interior West. 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 ratepayers. 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. Pollution control investments for 14 of PacifiCorp's coal units account for more than 60% of the generation-related capital investment expenditures for which the Company is seeking recovery, and increasing coal costs are a significant component of the overall increase in net power cost. Net power cost constitutes more than 60% of the Company's overall rate increase request. In addition, rate design proposals can encourage energy efficiency and conservation, as well as the need for, timing, and type of new resources. By its intervention, WRA intends to address costs associated with continuing operation of PacifiCorp's coal fleet and potential rate design issues that impact utility resource need and development. These are core issues of concern for WRA.

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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and

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5. WRA also requests that the following name be added to the electronic service list for this docket: Penny Anderson (penny.anderson@westernresources.org).

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

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in blue ink, appearing to read 'CRD', is written on a light yellow rectangular background.

CHARLES R. DUBUC, JR.  
STEVEN S. MICHEL  
Attorneys for Western Resource Advocates

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March 2011, copies of the **Petition for Leave to Intervene of Western Resource Advocates** were sent to the Public Service Commission of Utah and were sent by email to each of the following:

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