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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of: the Application of Rocky Mountain Power for Alternative Cost Recovery for Major Plant Additions of the Ben Lomond to Terminal Transmission Line and the Dave Johnston Generation Unit 3 Emissions control Measure	Docket No. 10-035-13  <b>PETITION FOR LEAVE TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS</b>
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In accordance with the provisions of Utah Code Ann. § 63G-4-370 and Rule R746-100-7 of the Public Service Commission’s Rules of Practice and Procedure, Holcim, Inc., Kennecott Utah Copper, LLC, Kimberly-Clark Corp., Malt-O-Meal, Praxair, Inc., Proctor & Gamble, Inc., Tesoro Refining and Marketing Co., and Western Zirconium (this group of electrical power customers will be referred to hereinafter, for convenience only, as the “Utah Industrial Energy Consumers” or “UIEC”), hereby petition the Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding, and request that the Commission issue a scheduling order, including a hearing, on this matter.

In support of their Petition to Intervene, the UIEC state as follows:

1. The consumers herein referred to as UIEC are a group of industrial consumers who each take electrical service from Rocky Mountain Power (“RMP” or the “Company”).

2. The UIEC have joined together for the purposes of intervention in this docket to have their common interests represented. The interests of each of the UIEC consumers will not be adequately represented by any other party to this proceeding.

3. The UIEC have a direct, immediate, and substantial interest in this proceeding as customers of Rocky Mountain because the rate they pay for electric service may be affected by a Commission decision in this proceeding.

4. Petitioners seek to intervene in this proceeding for the purpose of raising the issues of allocation to Utah of any amounts allowed by the Commission, the timing and process of the recovery of any such allocation into rates, and the appropriate carrying charge of any amount allowed.

5. If the UIEC consumers are granted leave to intervene in this proceeding, they hereby request that service of all pleadings, notices, etc. be made to the following:

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6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the UIEC's Petition to Intervene.

7. WHEREFORE, the UIEC request that the Commission enter an Order granting the consumers herein referred to as the UIEC permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 22<sup>nd</sup> day of March, 2010.

/S/ F. Robert Reeder  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of March 2010, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION FOR LEAVE TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS** to:

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