

F. ROBERT REEDER (2710)
WILLIAM J. EVANS (5276)
VICKI M. BALDWIN (8532)
PARSONS BEHLE & LATIMER
One Utah Center
201 South Main Street, Suite 1800
Post Office Box 45898
Salt Lake City, UT 84145-0898
Telephone: (801) 532-1234
Facsimile: (801) 536-6111
Attorneys for UIEC, an Intervention Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase Its Proposed Electric Service Schedules and Electric service Regulations.

Docket No. 11-035-200

PETITION FOR LEAVE TO INTERVENE OF UIEC, AN INTERVENTION GROUP

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, 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 Utah Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding, and request that the Commission issue an order allowing UIEC to participate fully in this matter.

In support of its Petition to Intervene, UIEC states as follows:

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

2. The entities that are a part of 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 entities of 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. The consumers herein referred to as the UIEC have not yet determined the level of their participation or the precise nature of the relief the UIEC will seek, but request that the Commission grant the UIEC intervention as their interests may appear.

5. If UIEC is granted leave to intervene in this proceeding, it hereby requests that service of all pleadings, notices, etc. be made to the following:

Robert F. Reeder
William J. Evans
Vicki M. Baldwin
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
bobreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com

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

7. WHEREFORE, UIEC requests that the Commission enter an Order granting UIEC 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.

DATED this 9th day of March, 2012.

/s/ Vicki M. Baldwin

Robert F. Reeder
William J. Evans
Vicki M. Baldwin
PARSONS BEHLE & LATIMER
Attorneys for UIEC, an Intervention Group

CERTIFICATE OF SERVICE

Docket No. 11-035-200

I hereby certify that on this 9th day of March 2012, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION FOR LEAVE TO INTERVENE OF UIEC**, an intervention group to:

Patricia Schmid
Assistant Attorneys General
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pschmid@utah.gov

Michele Beck
Executive Director
Committee of Consumer Services
500 Heber Wells Building
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov

David L. Taylor
Yvonne R. Hogle
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
Dave.Taylor@PacifiCorp.com
yvonne.hogle@pacificorp.com
datarequest@pacificorp.com

Chris Parker
William Powell
Dennis Miller
Division of Public Utilities
500 Heber Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
wpowell@utah.gov
dennismiller@utah.gov
chrisparker@utah.gov

Paul Proctor
Assistant Attorneys General
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Cheryl Murray
Dan Gimble
Danny Martinez
Utah Committee of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
cmurray@utah.gov
dgimble@utah.gov
dannymartinez@utah.gov

Gary Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com

Gerald H. Kinghorn
Jeremy R. Cook
Parsons Kinghorn Harris, P.C.
111 East Broadway, 11th Flr.
Salt Lake City, Utah 84111
ghk@pkhlawyers.com
jrc@pkhlawyers.com

Gregory B. Monson
D. Matthew Moscon
Stoel Rives LLP
201 South Main Street, Suite 1100
Salt Lake City, UT 84111
gbmonson@stoel.com
dmmonson@stoel.com

Peter J. Mattheis
Eric J. Lacey
Brickfield, Bruchette, Ritts &
Stone, P.C.
1025 Thomas Jefferson St., N.W.
800 West Tower
Washington, D.C. 2007
pjm@bbrslaw.com
elacey@bbrslaw.com

Kevin Higgins
Neal Townsend
ENERGY STRATEGIES
215 S. State Street, #200
Salt Lake City, UT 84111
khiggins@energystrat.com
ntownsend@energystrat.com

/s/ Colette V. Dubois