

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. 11-035-200
---	---	-----------------------

PETITION TO INTERVENE OF AARP

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.¹ 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).

¹ 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, pleadings, communications, orders and the decision in this matter should be addressed to:

Bruce Plenk
Law Office of Bruce Plenk
2958 N St Augustine Pl
Tucson, AZ 85712
Ph: 520 795-8611 or 520 909-1389
E-mail: bplenk@igc.org

Janee Briesemeister
AARP
98 San Jacinto Blvd. Ste. 750
Austin, TX 78701
Ph: (512) 480-2426
E-mail: jbriesemeister@aarp.org

Charles Johnson
1086-7B Pleasant Blvd
Toronto, Ontario M4T1K2
Ph: 801 518-1435
E-mail: cjohnson@ieee.org

4. On March 2, 2012, the Commission issued an Order directing interested parties wishing to intervene to do so by April 30, 2012. This petition is therefore timely.

5. 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.

6. 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.

7. 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 26th day of April, 2012.

Respectfully submitted,

_____/s/_____
Bruce Plenk USB#2613
Law Office of Bruce Plenk
2958 N St Augustine Pl
Tucson, AZ 85712
Ph: 520 795-8611/909-1389
E-mail: bplenk@igc.org
Attorney for Petitioner AARP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene in Docket No. 11-035-200 of AARP was mailed electronically this day of April, 2012, to the following:

Mark C. Moench
Yvonne R. Hogle
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
mark.moench@pacificorp.com
yvonne.hogle@pacificorp.com

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

David L. Taylor
Utah Regulatory Affairs Manager
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
david.taylor@pacificorp.com

Patricia Schmid
Assistant Attorney General

160 East 300 South, 5th Floor
Salt Lake City, UT 84111
pschmid@utah.gov

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

Paul Proctor
Assistant Attorney General
160 East 300 South, 5th Floor
Salt Lake City, UT 84111
pproctor@utah.gov

Michele Beck
Cheryl Murray
Dan Gimble
Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov
cmurray@utah.gov
dgimble@utah.gov

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
Parsons Behle & Latimer
201 South Main Street, Suite 1800
P.O. Box 45898
Salt Lake City, UT 84145-0898
bobreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com

Gary A. Dodge
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
gdodge@hjdllaw.com

Kevin Higgins
Neal Townsend
ENERGY STRATEGIES
215 South State Street, # 200
Salt Lake City, UT 84101
khiggins@energystrat.com
ntownsend@energystrat.com
Holly Rachel Smith, Esq.
Holly Rachel Smith, PLLC
Hitt Business Center
3803 Rectortown Road
Marshall, VA 20115
holly@raysmithlaw.com

Ryan L. Kelly
Kelly & Bramwell, PC
Attorneys at Law
11576 South State Street Bldg. 203
Draper, UT 84020 ryan@kellybramwell.com

Steve W. Chriss
Wal-Mart Stores, Inc.
2001 SE 10th Street
Bentonville, AR 72716-0550
stephen.chriss@wal-mart.com

Peter J. Mattheis
Eric J. Lacey
Brickfield, Burchette, Ritts & STONE, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
pjm@bbrslaw.com
elacey@bbrslaw.com

Gerald H. Kinghorn
Jeremy R. Cook
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor

Salt Lake City, UT 84111
ghk@pkhlawyers.com
jrc@pkhlawyers.com

Kurt J. Boehm, Esq.
Jody M. Kyler, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Ste 1510
Cincinnati, Ohio 45202
kboehm@BKLawfirm.com
jkyler@BKLawfirm.com

Brian W. Burnett, Esq.
CALLISTERNEBEKER & MCCULLOUGH
Zions Bank Building
10 East South Temple, Suite 900
Salt Lake City, Utah 84133
brianburnett@cnmlaw.com

Stephen J. Baron
J. Kennedy & Associates
570 Colonial Park Drive, Suite 305
Roswell, GA 30075
sbaron@jkenn.com

Sophie Hayes
Sarah Wright
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84111
sophie@utahcleanenergy.org
sarah@utahcleanenergy.org

Rob Dubuc
Western Resource Advocates
150 South 600 East, Suite 2A
Salt Lake City, UT 84102
rdubuc@westernresources.org

Steven S. Michel
Western Resource Advocates
409 E. Palace Ave. Unit 2
Santa Fe, NM 87501
smichel@westernresources.org

Nancy Kelly
Western Resource Advocates
9463 N. Swallow Rd.
nkelly@westernresources.org

Roger Swenson
US Magnesium LLC
238 North 2200 West
Salt Lake City, UT 84114-6751
roger.swenson@prodigy.net

Capt Samuel T. Miller
USAF Utility Law Field Support Center
139 Barnes Ave, Suite 1
Tyndall AFB, FL 32403
Samuel.Miller@Tyndall.af.mil

Travis Ritchie
Jeff Speir
Sierra Club
Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
travis.ritchie@sierraclub.org
jeff.speir@sierraclub.org

Betsy Wolf
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
FAX: (801) 355-1798
PHONE: (801) 891-5040
E-mail: bwolf@slcap.org

Janee Briesemeister
AARP
98 San Jacinto Blvd. Ste. 750
Austin, TX 78701
Ph: (512) 480-2426
E-mail: jbriesemeister@aarp.org

Charles Johnson
1086-7B Pleasant Blvd
Toronto, Ontario M4T1K2
Ph: 801 518-1435
E-mail: cjohnson@ieee.org

Arthur Sandack
8 East Broadway, Ste 411
Salt Lake City, UT 84111
Ph: 801 595-1300
E-mail: asandack@msn.com

DATED this 26th_day of April, 2012.

_____/s/_____
Bruce Plenk
Attorney for AARP