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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the matter of:

**THE APPLICATION OF ROCKY
MOUNTAIN POWER FOR APPROVAL
OF CHANGES TO RENEWABLE
AVOIDED COST METHODOLOGY
FOR QUALIFYING FACILITIES
PROJECTS LARGER THAN THREE
MEGAWATS**

Docket No. 12-035-100

**PETITION FOR LEAVE TO
INTERVENE OF WESTERN
RESOURCE ADVOCATES**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), Western Resource Advocates (WRA) hereby petitions 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, a Utah board member, and members who live in Utah and are

PacifiCorp/Rocky Mountain Power ratepayers. WRA has participated in Commission proceedings for over 16 years and has been granted intervenor status in multiple Commission dockets.

2. WRA has a substantial interest in the above-captioned proceeding because of the impact the outcome of this proceeding could have on large renewable qualifying facilities.

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

Dated this 17th day of December 2012.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in blue ink, appearing to read 'CR Dubuc', is written over a light yellow rectangular background.

Charles R. Dubuc
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CERTIFICATE OF SERVICE

Docket No. 12-035-100

I hereby certify that on this 17th day of December 2012, I caused to be e-mailed, a true and correct copy of the foregoing to:

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