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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the matter of:

**THE VOLUNTARY REQUEST OF
ROCKY MOUNTAIN POWER FOR
APPROVAL OF RESOURCE
DECISION TO CONSTRUCT
SELECTIVE CATALYTIC
REDUCTION SYSTEMS ON JIM
BRIDGER UNITS 3 AND 4**

Docket No. 12-035-92

**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, two Utah board members, 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. PacifiCorp has voluntarily requested approval to install selective catalytic reduction systems (SCR) on Units 3 and 4 of its Jim Bridger coal-fired facility. By its intervention, WRA intends to address whether installing SCR is the best alternative given the size of the required capital investment; the potential for further expenditures to comply with existing, proposed, and potential EPA rulemakings; low natural gas price forecasts; and uncertainty regarding the potential cost of CO₂ emissions. CO₂ is a greenhouse gas responsible for climate change.

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 11th day of September 2012.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES



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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September 2012, the **PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES** was served by email to each of the following:

Rocky Mountain Power

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