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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 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., 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. It appears that this is the first time RMP has filed for pre-approval of a major emissions reduction program. The consumers herein referred to as the UIEC anticipate participating in the proceedings to the extent necessary to protect their interests in future rate making proceedings for the rate recovery of the subject emissions reduction program. Therefore, the UIEC requests that the Commission grant it intervention.

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:

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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 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 22nd day of October, 2012.

/s/ Vicki M. Baldwin

Robert F. Reeder
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CERTIFICATE OF SERVICE

Docket No. 12-035-92

I hereby certify that on this 22nd day of October 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:

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