

**STATE OF UTAH**

**Public Service Commission**

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

**SIERRA CLUB  
PETITION TO INTERVENE**

**November 14, 2012**

Gloria D. Smith, Senior Attorney  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
(415) 977-5532 Voice  
[gloria.smith@sierraclub.org](mailto:gloria.smith@sierraclub.org)

Travis Ritchie, Associate Attorney  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
(415) 977-5727 Voice  
[travis.ritchie@sierraclub.org](mailto:travis.ritchie@sierraclub.org)

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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Sierra Club, hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Sierra Club petitions to intervene in this proceeding on behalf of itself and its approximately 3,600 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power (“RMP” or the “Company”).
2. The interests of each of the Sierra Club and its members will not be adequately represented by any other party to this proceeding.
3. The legal rights and interests of Sierra Club and its members may be substantially affected by this proceeding.
4. Sierra Club has not fully determined the specific positions it will take or the relief it will seek. Sierra Club seeks to intervene for purposes of protecting its interests and the interests of its members as they may appear, particularly on

issues of relevance to the public health, environmental, and economic impacts of the Company's proposed actions.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Sierra Club to intervene.
6. Notices in this proceeding should be sent to the following:

Travis Ritchie, Associate Attorney  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
(415) 977-5727  
travis.ritchie@sierraclub.org

WHEREFORE, Sierra Club requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

DATED this 14<sup>th</sup> day of November, 2012.

Respectfully submitted,

*Original Signed by:*

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Travis Ritchie  
Associate Attorney  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
(415) 977-5727  
travis.ritchie@sierraclub.org

## CERTIFICATE OF SERVICE

I hereby certify that on this 14<sup>th</sup> of November, 2012, a true copy of the foregoing document was sent via email to the following:

Patricia Schmid  
Justin Jetter  
Paul Proctor  
Assistant Attorneys General  
Heber Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111  
psc@utah.gov  
pschmid@utah.gov  
jjetter@utah.gov  
pproctor@utah.gov

Michele Beck  
Executive Director  
Committee of Consumer Services  
Heber Wells Building, 4<sup>th</sup> Floor  
160 East 300 South, 2nd Floor  
Salt Lake City, UT 84111  
mbeck@utah.gov

F. Robert Reeder  
William J. Evans  
Vicki M. Baldwin  
Elizabeth L. Silvestrini  
Parsons Behle & Latimer  
One Utah Center  
201 South Main Street, Suite 1800  
Post Office Box 45898  
Salt Lake City, UT 84145-0898  
BobReeder@parsonsbehle.com  
BEvans@parsonsbehle.com  
VBaldwin@parsonsbehle.com  
Esilvestrini@parsonsbehle.com

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

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

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

Mark C. Moench  
David L. Taylor  
Daniel E. Solander  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111  
Mark.moench@pacificorp.com  
Dave.Taylor@PacifiCorp.com  
Daniel.solander@pacificorp.com

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

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
datarequest@pacificorp.com  
Charles R. Dubuc  
Steven S. Michel  
Nancy Kelly  
Western Resource Advocates  
150 South 600 East, Suite 2AB  
Salt Lake City, UT 84102  
rdubuc@westernresources.org  
smichel@westernresources.org  
nkelly@westernresources.org

Respectfully submitted,

*Original Signed by:*

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Derek Nelson  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
(415) 977-5595 Voice  
(415) 977-5739 Facsimile  
[derek.nelson@sierraclub.org](mailto:derek.nelson@sierraclub.org)