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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for a Certificate of Public Convenience and Necessity Authorizing Construction of the Sigurd – Red Butte No. 2 - 345 kV Transmission Line.	Docket No. 12-035-97 PETITION FOR LEAVE TO INTERVENE OF UAMPS, AN INTERVENTION GROUP
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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, Utah Associated Municipal Power Systems (“UAMPS”) hereby submits this Petition to Intervene (“Petition”) to the Utah Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding and requests that the Commission issue an order allowing UAMPS to participate fully in this matter. UAMPS should be permitted to intervene because its legal rights and interests are substantially affected by the Application for Certificate of Public Convenience and Necessity (“CPCN”) authorizing construction of the Sigurd-Red Butte No. 2-345 kV Transmission Line.

In support of its Petition, UAMPS states as follows:

1. UAMPS is a Utah interlocal entity and a political subdivision of the State of Utah. UAMPS was established in 1980, pursuant to the applicable provisions of the Interlocal

Cooperation Act, Title 11, Chapter 13, Utah Code Ann. (1953), as amended and supplemented from time to time (the "Act"). UAMPS is not subject to the Commission's jurisdiction except for the very limited circumstance when UAMPS is applying for a CPCN to construct a generating plant or transmission line. *See* Utah Code Ann. § 11-13-304 (1). UAMPS' current members include municipalities, cooperatives, joint action agencies, and public utility districts from the states of Utah, Arizona, California, Idaho, Nevada, New Mexico, Wyoming and Oregon. UAMPS' purposes include planning, financing, development, acquisition, construction, improvement, betterment, operation, and maintenance of projects for the generation, transmission, and distribution of electric energy, for the benefit of its members. The interests of UAMPS will not be adequately represented by any other party to this proceeding.

2. UAMPS has a direct, immediate, and substantial interest in this proceeding as network transmission customer of PacifiCorp (the parent company of Rocky Mountain).

3. UAMPS, with its members in southwest Utah, participate with PacifiCorp, Deseret Power and Dixie-Escalante Rural Electric Authority in the Washington County Technical Task Force ("WCTTF") for the coordinated planning and operations of the transmission systems in Washington and Iron County. The WCTTF was formed in the early 1990's pursuant to direction from the Commission as part of the resolution of litigation over transmission service to southwest Utah between UAMPS and Utah Power & Light (PacifiCorp's predecessor). *See* Case Nos. 85-2011-01, 85-999-08, 85-035-08, 87-035-26 and 89-2011-01. Since then, UAMPS, Deseret and PacifiCorp have participated in the WCTTF and performed coordinated transmission planning and constructed transmission facilities to serve the area loads. The second Sigurd – Red Butte 345 kV line, the subject of this CPCN request, is a direct outcome and an integral part of this joint transmission planning process. As the Commission hoped for when creating the task force, the participating members of the WCTTF informed, contributed to, evaluated PacifiCorp's transmission planning process and endorsed the second Sigurd -Red Butte transmission line as the most economical solution to maintain reliable service to the area loads and meet PacifiCorp's other needs. Because of our participation in the planning process, UAMPS supports the construction of the line to better assure the transmission reliability for UAMPS' members located in southwestern Utah and the rest of the PacifiCorp system and requests that the Commission grant UAMPS intervention.

4. The WCTTF provides a forum for joint and coordinated transmission planning. While each load serving entity performs their own resource planning, the WCTTF, as a group, uses the load projections developed individually by each entity and bases transmission planning on those projections. UAMPS relies on this planning to determine the need or ability to import resources or construct local generation sources. The availability of this new transmission capacity offered by this line addition is a critical assumption for WCTTF planning upon which UAMPS has relied.

5. If UAMPS 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 UAMPS' Petition to Intervene.

7. WHEREFORE, UAMPS requests that the Commission enter an Order granting UAMPS 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 16th day of November, 2012.

/s/ Mason F. Baker

Mason F. Baker
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Attorney for UAMPS, an Intervention
Group

CERTIFICATE OF SERVICE

Docket No. 12-035-97

I hereby certify that on this 16th day of November 2012, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION FOR LEAVE TO INTERVENE OF UAMPS**, an intervention group to:

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