

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power for Approval of Revisions to Back-Up, Maintenance, and Supplementary Power Service Tariff, Electric Service Schedule 31	<b>DOCKET NO. 13-035-196</b>
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**PETITION FOR LEAVE TO INTERVENE OF  
SOUTHWEST ENERGY EFFICIENCY PROJECT**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Southwest Energy Efficiency Project petitions for leave to intervene in this docket. In support of this petition, Southwest Energy Efficiency Project states as follows:

1. The Southwest Energy Efficiency Project is a not-for-profit public interest organization dedicated to advancing energy efficiency in a six-state region that includes Utah, Arizona, Colorado, Nevada, New Mexico, and Wyoming. The Southwest Energy Efficiency Project has been active in Utah energy regulatory matters since its founding in 2001.

2. The Southwest Energy Efficiency Project considers combined heat and power (CHP, also known as cogeneration) to be an important efficiency resource that provides economic, environmental, and security benefits to Utah businesses and residents.

3. On December 4, 2013, Rocky Mountain Power filed an application for proposed changes to its Back-Up, Maintenance, and Supplementary Power Service Tariff, Electric Service Schedule 31.

4. The Southwest Energy Efficiency Project has a substantial interest in the above-captioned proceeding. This proceeding will determine the level and structure of rates affecting existing and future combined heat and power or cogeneration facilities served by Rocky

Mountain Power in Utah. As an advocacy organization for energy efficiency in the Southwestern states, and considering that combined heat and power is an important efficiency resource, Southwest Energy Efficiency Project's legal rights and tangible interests may be substantially affected by this proceeding.

5. Intervention by Southwest Energy Efficiency Project will not unduly broaden the issues or delay the proceeding. This petition for leave to intervene is timely filed. Southwest Energy Efficiency Project does not currently know what evidence or specific positions, if any, it would present in this proceeding. Southwest Energy Efficiency Project seeks to intervene for purposes of protecting its interests as they arise.

7. Southwest Energy Efficiency Project's interests are not adequately represented by another party in this proceeding.

8. If granted leave to intervene in this proceeding, The Southwest Energy Efficiency Project request that all notices, pleadings, correspondence, discovery and other documents be sent to the following:

Christine Brinker  
Southwest Energy Efficiency Project  
2334 Broadway, Suite A  
Boulder, CO 80304  
720-939-8333  
cbrinker@swenergy.org

WHEREFORE, Southwest Energy Efficiency Project respectfully requests that the Commission grant this petition for leave to intervene.

DATED this 15<sup>th</sup> day of May, 2014.

Respectfully submitted,



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