

Justin Wilson
Western Clean Energy Campaign
1536 Wynkoop St., Suite 420
Denver, CO 80202
720-446-9232

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**In the Matter of Rocky Mountain Power’s
2015 Integrated Resource Plan**

DOCKET NO. 15-035-04

**Western Clean Energy Campaign’s
Petition for Leave to Intervene**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Western Clean Energy Campaign respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket. In support of this petition, Western Clean Energy Campaign states as follows:

1. Western Clean Energy Campaign is a fiscally sponsored non-profit working to promote a transition toward a clean, renewable electric generating system. The Western Clean Energy Campaign has been a participant in Rocky Mountain Power’s 2013 and 2015 Integrated Resource Planning processes offering valuable stakeholder feed back related to regulatory requirements for pollution controls and specific modeling scenarios.

2. As an advocate for renewable energy and decreasing pollution from fossil fuel generation Western Clean Energy Campaigns’ legal rights and interests may be substantially affected by this proceeding. Rocky Mountain Power’s *2015 Integrated Resource Plan (IRP)* will provide direction to the company for its near- and long-term resource procurement (and

retirement) decisions as such Western Clean Energy Campaign has direct interest in Rocky Mountain Power's resource planning and decision-making, and the consequences thereof.

3. Western Clean Energy Campaign has not fully determined specific positions it will take or the relief it will seek. Western Clean Energy Campaign seeks to intervene for purposes of protecting its interests as they arise.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Western Clean Energy Campaign to intervene.

5. Western Clean Energy Campaign's interests are not adequately represented by another party in this proceeding.

6. If Western Clean Energy Campaign is granted leave to intervene in this proceeding, notices should be sent to the following:

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WHEREFORE, Western Clean Energy Campaign requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 27th day of January, 2015.

Respectfully submitted,
WESTERN CLEAN ENERGY CAMPAIGN

Justin Wilson
Director, Western Clean Energy Campaign

CERTIFICATE OF SERVICE
Docket No. 15-035-04

I hereby certify that a true and correct copy of the foregoing was served by email this 27th day of January, 2015 on the following:

ROCKY MOUNTAIN POWER:

Yvonne Hogle	yvonne.hogle@pacificorp.com
Bob Lively	bob.lively@pacificorp.com

DIVISION OF PUBLIC UTILITIES:

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/s/ Justin Wilson