

Gloria D. Smith
Managing Attorney
Sierra Club Environmental Law Program
85 Second Street, Second floor
San Francisco, CA 94105
(415) 977-5532
gloria.smith@sierraclub.org

STATE OF UTAH

Public Service Commission

In the Matter of:

Rocky Mountain Power's Integrated Resource
Plan

Docket No. 15-035-04

**SIERRA CLUB
PETITION TO INTERVENE**

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, Sierra Club states:

1. Sierra Club petitions to intervene on behalf of itself and its nearly 4,000 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 both 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 may seek. Sierra Club seeks to intervene for purposes of protecting its interests and the interests of its

members, particularly on issues of public health, environmental protection, and economic impacts of the Company's investments in renewable energy and its fleet of coal-fired power plants. Petitioner is concerned that aspects of RMP's Integrated Resource Plan would increase pollution - including emissions of greenhouse gases - into the atmosphere, thus exacerbating the environmental and human health impacts already harming its members' interests. Sierra Club intends to explore these issues and others that may arise in the proceeding.

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:

Gloria D. Smith
Managing Attorney
Sierra Club Environmental Law Program
85 Second Street, Second floor
San Francisco, CA 94105
(415) 977-5532
gloria.smith@sierraclub.org

Derek Nelson
Legal Assistant
Sierra Club Environmental Law Program
85 Second Street, Second floor
San Francisco, CA 94105
(415) 977-5595
derek.nelson@sierraclub.org

7. Gloria D. Smith is an attorney in good standing and licensed to practice law in California (CA Bar No. 200824.) Ms. Smith is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-100-6(b).

////

////

////

////

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 13th day of April, 2015.

Respectfully submitted,

Original signed by:

Gloria D. Smith
Managing Attorney
Sierra Club Environmental Law Program
85 Second Street, Second floor
San Francisco, CA 94105
(415) 977-5532
gloria.smith@sierraclub.org