

Matt Pacenza  
Robert DeBirk  
HEALTHY ENVIRONMENT ALLIANCE OF UTAH  
824 S 400 W, Suite B-111  
Salt Lake City, UT 84105  
801-355-5055

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<b>In the Matter of Rocky Mountain Power's 2015 Integrated Resource Plan</b>	<b>DOCKET NO. 15-035-04</b> <b>Healthy Environment Alliance of Utah's Petition for Leave to Intervene</b>
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, the Healthy Environment Alliance of Utah respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket.

In support of this petition, the Healthy Environment Alliance of Utah states as follows:

1. The Healthy Environment Alliance of Utah (HEAL Utah) is a grassroots non-profit dedicated to promoting clean energy, protecting our health and the environment from toxic risks and involving citizens in the decisions affecting our health and environment. Since our founding, HEAL Utah has been a watchdog on behalf of Utah’s citizens on a range of nuclear, toxic and dirty energy threats, as well as an advocate for cleaner, more sustainable solutions. HEAL Utah petitions to intervene on behalf of itself and its nearly 8,000 supporters who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power.

2. As a public interest organization that advocates for renewable energy and clean communities, HEAL Utah's legal rights and interests may be substantially affected by this proceeding. PacifiCorp/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, HEAL Utah and its supporters have a direct interest in PacifiCorp/Rocky Mountain Power's resource planning and decision-making, and the consequences thereof.

3. HEAL Utah has not fully determined specific positions it will take or the relief it will seek. HEAL Utah seeks to intervene for purposes of protecting its interests and the interests of its members, specifically as they relate to issues of clean energy, and protecting public health and the environment.

4. The interests of justice, and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing HEAL Utah to intervene.

5. HEAL Utah's interests are not adequately represented by another party in this proceeding.

6. Notices in this proceeding should be sent to the following:

Matt Pacenza  
Robert DeBirk  
HEALTHY ENVIRONMENT ALLIANCE OF UTAH  
824 S 400 W, Suite B-111  
Salt Lake City, UT 84101  
801-355-5055  
Matt@healutah.org  
Rob@healutah.org

WHEREFORE, the Healthy Environment Alliance of Utah requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 4<sup>th</sup> day of May 2015.

Healthy Environment Alliance of Utah

Robert DeBirk

Robert DeBirk

*Policy Director for Healthy Environment Alliance of Utah*

**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 4<sup>h</sup> day of May on the following:

**ROCKY MOUNTAIN POWER:**

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

**DIVISION OF PUBLIC UTILITIES:**

Patricia Schmid	pschmid@utah.gov
Justin Jetter	jjetter@utah.gov
Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Dennis Miller	dennismiller@utah.gov

**OFFICE OF CONSUMER SERVICES:**

Rex Olsen	rolsen@utah.gov
Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov
Bela Vastag	bvastag@utah.gov

**UTAH ASSOCIATION OF ENERGY USERS**

Gary Dodge	gdodge@hjdllaw.com
Don Hendrickson	dhendirckson@energystrat.com

**UTAH CLEAN ENERGY**

Sophie Hayes	sophie@utahcleanenergy.org
Sara Wright	sarah@utahcleaneenergy.org
Mitalee Gupta	mgupta@utahcleanenergy.org

**WESTERN CLEAN ENERGY CAMPAIGN**

Justin D. Wilson	jwilson@westerncec.org
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**IDAHO CONSERVATION LEAGUE**

Benjamin J. Otto	botto@idahoconservation.org
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**SIERRA CLUB**

Gloria Smith	gloria.smith@sierraclub.org
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INTERWEST ENERGY ALLIANCE

Lisa Tormoen Hickey

lisahickey@coloradolawyers.net

/s/ Robert DeBirk