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*Attorneys for Praxair, Inc.*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of an Energy Services Agreement between Rocky Mountain Power and Kennecott Utah Copper, LLC	<b>DOCKET NO. 16-035-33</b> <b>PETITION TO INTERVENE OF PRAXAIR, INC.</b>
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Praxair, Inc. (“Praxair”) petitions the Public Service Commission of Utah (“Commission”) for intervention in the above-entitled matter pursuant to Utah Code Ann. § 63G-04-207 and Utah Admin. Code R746-100-7.

In support of this Petition to Intervene, Praxair, represents and states as follows:

1. Praxair is a Delaware corporation, qualified to do business as a foreign legal entity in the State of Utah, with headquarters in Danbury, Connecticut. Praxair is engaged in the production of a wide variety of gas products such as nitrogen, oxygen and argon.
2. Praxair is located on property owned by Kennecott Utah Copper, LLC (“Kennecott”) and provides a significant portion of its products directly to Kennecott.
3. For approximately five years, Praxair has received its electricity requirements at its Utah facility under Kennecott’s current special contract with Rocky Mountain Power (“RMP”).

4. Praxair has been informed that Kennecott's proposed special contract, the subject of this proceeding, will not provide for Praxair to receive electricity pursuant to its terms and conditions.
5. Praxair is very concerned about the impact of RMP's proposed special contract with Kennecott and the impact it could have on Praxair's electrical rates. Praxair has a significant interest in the above-captioned matter and its legal rights or interests and the costs and reliability of its electricity supply may be substantially affected by the outcome.
6. Praxair's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings.
7. Praxair's interests are not adequately represented by another party in this proceeding.
8. Praxair requests that copies of all notices and filings in this docket be served on:

Brian W. Burnett, Esq.  
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Email: [brianburnett@cnmlaw.com](mailto:brianburnett@cnmlaw.com)

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Please serve all documents electronically whenever possible.

NOW THEREFORE, Praxair respectfully requests that the Commission enter an Order granting Praxair's Petition to Intervene in this docket allowing Praxair to participate to the fullest extent allowed by law.

Dated this 20<sup>th</sup> day of September, 2016.

Callister Nebeker & McCullough

/s/ Brian W. Burnett

Brian W. Burnett

## Certificate of Service

I hereby certify that on September 20<sup>th</sup>, 2016, I caused a true and correct copy of the foregoing Petition to Intervene of Praxair, Inc. to be emailed to the following:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
PacifiCorp

Chris Parker ([ChrisParker@utah.gov](mailto:ChrisParker@utah.gov))  
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Rocky Mountain Power

/s/ Brian W. Burnett

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