

Jennifer E. Gardner (15503)  
Western Resource Advocates  
150 South 600 East, Suite 2A  
Salt Lake City UT 84102  
801-413-7355  
[jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)

*Attorney for Western Resource Advocates*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p><b>IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO IMPLEMENT PROGRAMS AUTHORIZED BY THE SUSTAINABLE TRANSPORTATION AND ENERGY PLAN ACT</b></p>	<p><b>Docket No. 16-035-36</b></p> <p><b>PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES</b></p>
---	--

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”) and the Commission’s September 26 Phase One Scheduling Order, Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a non-profit conservation organization dedicated to protecting the land, air and water of the West. WRA’s Clean Energy Program develops and implements policies to reduce environmental impacts of the electric power industry in the Interior West by advocating for a western electric system that provides affordable and reliable energy, reduces economic risks, and protects the environment through the expanded use of energy efficiency, renewable energy resources, and other clean energy technologies. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are PacifiCorp/Rocky Mountain Power ratepayers. WRA has participated in electric utility

proceedings for over 20 years and has been granted intervenor status in multiple Utah Commission dockets.

2. WRA has a substantial interest in the above-captioned proceeding. Pursuant to Utah Code Annotated (“U.C.A”) § 54-20-101, *et seq.*, also known as Senate Bill 115 – the Sustainable Transportation and Energy Plan Act (“STEP”) – the Commission is charged with authorizing Rocky Mountain Power to implement tariffs to provide funding for a number of programs, including: (1) an electric vehicle incentive program; (2) a clean coal technology research program; (3) innovative utility programs including commercial line extensions, solar generation, battery storage, coal generation plant emissions curtailment (or other programs that may be proposed later); and (4) other conservation, efficiency or other new technology programs. WRA’s interest is directly related to Rocky Mountain Power’s program offerings through STEP. To enable WRA to effectively analyze and assess these programs, and to provide intervenor expertise and input, WRA requests that its intervention be granted and that it be given party status in this proceeding.

3. Intervention by WRA will not unduly broaden the issues or delay the proceeding. WRA’s petition for leave to intervene is timely filed. WRA does not currently know what evidence or argument, if any, it would present in this proceeding.

4. WRA requests that all pleadings, correspondence, discovery and other documents be served on the following:

Jennifer E. Gardner  
Western Resource Advocates  
150 South 600 East, Suite 2A  
Salt Lake City UT 84102  
801-413-7355  
[jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)

Nancy Kelly  
Western Resource Advocates  
9463 N. Swallow Rd.  
Pocatello, ID 83201  
208-234-0636  
[nkelly@westernresources.org](mailto:nkelly@westernresources.org)

5. WRA also requests that the following name be added to the electronic service list for this docket: Penny Anderson ([penny.anderson@westernresources.org](mailto:penny.anderson@westernresources.org)).

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Dated this 28th day of September 2016.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

---

Jennifer E. Gardner (15503)  
Western Resource Advocates  
150 South 600 East, Suite 2A  
Salt Lake City UT 84102  
801-413-7355  
[jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)

CERTIFICATE OF SERVICE  
Docket No. 16-035-36

I hereby certify that a true and correct copy of the foregoing was served by email this 28th day of September 2016 on the following:

**PacifiCorp**

Daniel Solander  
Jeff Richards  
Yvonne Hogle  
Jeff Larsen  
Bob Lively

[daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)  
[jeff.richards@pacificorp.com](mailto:jeff.richards@pacificorp.com)  
[yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)  
[jeff.larsen@pacificorp.com](mailto:jeff.larsen@pacificorp.com)  
[bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com)  
[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

**Office of Consumer Services**

Cheryl Murray  
Michele Beck  
Bela Vastag

[cmurray@utah.gov](mailto:cmurray@utah.gov)  
[mbeck@utah.gov](mailto:mbeck@utah.gov)  
[bvastag@utah.gov](mailto:bvastag@utah.gov)

**Utah Division of Public Utilities**

Patricia Schmid  
Chris Parker  
Artie Powell  
Justin Jetter  
Rex Olsen  
Robert Moore  
Erika Tedder

[pschmid@utah.gov](mailto:pschmid@utah.gov)  
[chrisparker@utah.gov](mailto:chrisparker@utah.gov)  
[wpowell@utah.gov](mailto:wpowell@utah.gov)  
[jjetter@utah.gov](mailto:jjetter@utah.gov)  
[rolsen@utah.gov](mailto:rolsen@utah.gov)  
[rmoore@utah.gov](mailto:rmoore@utah.gov)  
[etedder@utah.gov](mailto:etedder@utah.gov)

**Sierra Club**

Joseph Halso

[joe.halso@sierraclub.org](mailto:joe.halso@sierraclub.org)

**Utah Association of Energy Users**

Gary Dodge  
Kevin Higgins  
Don Hendrickson

[gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
[dhendrickson@energystrat.com](mailto:dhendrickson@energystrat.com)

**Utah Clean Energy**

Sophie Hayes  
Sarah Wright

[sophie@utahcleanenergy.org](mailto:sophie@utahcleanenergy.org)  
[sarah@utahcleanenergy.org](mailto:sarah@utahcleanenergy.org)

**Western Resource Advocates**

Jennifer Gardner  
Nancy Kelly  
Penny Anderson

[jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)  
[nkelly@westernresources.org](mailto:nkelly@westernresources.org)  
[penny.anderson@westernresources.org](mailto:penny.anderson@westernresources.org)

Penny Anderson