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*Counsel for Utah Association of Energy Users*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power to Implement Program Authorized by the Sustainable Transportation and Energy Plan Act	Docket No. 16-035-36
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**PETITION TO INTERVENE OF THE  
UTAH ASSOCIATION OF ENERGY USERS**

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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Utah Association of Energy Users (“Petitioner” or “UAE”) hereby petitions for leave to intervene in this docket to address questions related to the Uinta Basin Study.

In support of this petition, Petitioner states as follows:

1. Petitioner is an organization that represents large Utah electric consumers who are customers of Rocky Mountain Power or whose rates are affected by Rocky Mountain Power’s rate structure.
2. The legal rights and interests of Petitioner and its members may be substantially affected by this proceeding.
3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for the purposes of protecting its interests and the

interests of its members as they may appear, particularly on issues of relevance to large electric customers.

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

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

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 18th day of March 2021.

Respectfully submitted,

By:



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Phillip J. Russell  
JAMES DODGE RUSSELL & STEPHENS, P.C.

*Attorneys for UAE*

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 18th day of March 2021 on the following:

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/s/ Phillip J. Russell