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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Decrease the Deferred EBA Rate through the energy Balancing Account Mechanism	Docket No. 17-035-01 PETITION TO INTERVENE OF UTAH INDUSTRIAL ENERGY CONSUMERS
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In accordance with Utah Code § 63G-4-207 and Rule R746-1-108 of the Utah Public Service Commission (“Commission”), Tesoro Refining & Marketing Company LLC, LafargeHolcim Ltd., and Post Holdings, Inc. d/b/a Malt-O-Meal Brands (collectively referred to, for convenience only, as the “Utah Industrial Energy Consumers” or “UIEC”), petition the Utah Public Service Commission (“Commission”) for leave to intervene in Docket No. 17-035-01 (“Docket”), and request that the Commission issue an order allowing UIEC to participate fully in this matter.

In support of its Petition to Intervene, the UIEC state as follows:

1. On March 17, 2017, PacifiCorp, doing business in Utah as Rocky Mountain Power (“RMP” or “Company”), filed an Application to Decrease the Deferred EBA Rate

through the energy Balancing Account Mechanism ("Application"), requesting approval to refund approximately \$6.5 million in EBA costs deferred during the period from January 1, 2016 through December 31, 2016.

2. Each of the petitioners referred to as the UIEC are industrial consumers who receive electric service from RMP.

3. Petitioners have a direct, immediate, and substantial interest in this proceeding because the rate they pay for electric service may be affected by a Commission decision on RMP's Application.

4. The petitioners have joined together to intervene in this Docket to have their common interests represented. Their interests will not be adequately represented by any other party to this proceeding.

5. If the UIEC are granted leave to intervene in this proceeding, they request that service of all pleadings, notices, and other filings in this docket be made to:

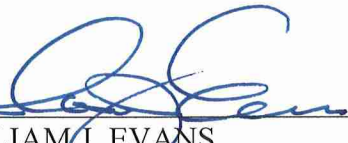
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6. The UIEC's intervention in this docket will not materially impair the interests of justice and the orderly and prompt conduct of this proceeding.

7. The UIEC have not yet fully determined the specific positions, level of their participation, or the relief the UIEC will seek, but seek leave to intervene to protect their interests and request that the Commission grant the UIEC intervention as their interests may appear.

WHEREFORE, the UIEC request that the Commission enter an Order granting the consumers referred to as the UIEC permission to intervene in this docket and to participate to the fullest extent allowed by the law.

DATED this 22nd day of September, 2017

/s/ 
WILLIAM J. EVANS
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Attorneys for UIEC, an Intervention Group

CERTIFICATE OF SERVICE
(Docket No. 17-035-01)

I hereby certify that on this 22nd day of September 2017, I caused to be e-mailed, a true and correct copy of the foregoing PETITION TO INTERVENE OF UTAH INDUSTRIAL ENERGY CONSUMERS to:

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