

Travis Ritchie (CA Bar No. 258084)
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER TO
EXTEND THE 2017 PROTOCOL
THROUGH DECEMBER 31, 2019

Docket No. 17-035-06

SIERRA CLUB PETITION TO INTERVENE

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner Sierra Club, hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Sierra Club petitions to intervene in this proceeding on behalf of itself and its approximately 4,800 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power (“RMP” or the “Company”).
2. The interests of each of the Sierra Club and its members will not be adequately represented by any other party to this proceeding. To the extent the interests of the Sierra Club overlap with any other party, Sierra Club will coordinate with that party to avoid duplicative efforts.
3. The legal rights and interests of Sierra Club and its members may be substantially affected by this proceeding.

4. Sierra Club has a substantial interest in this docket. Its members seek to advance energy development and resource procurement policies in Utah that recognize the benefits of appropriately-sited, low-emission electricity generating resources for Utah's economy and the health and well-being of its citizens and natural environment. Sierra Club has participated extensively in several dockets that address the costs and risks of Rocky Mountain Power's coal fleet. Sierra Club is uniquely positioned to address aspects of the multi-state protocol because Sierra Club has members in and frequently appears before regulatory bodies in each of the states served by PacifiCorp, Rocky Mountain Power's parent company. Sierra Club is concerned that the Company's request to extend the 2017 multi-state protocol allocation process by an additional year will defer crucial questions about how Utahans will be expected to pay for PacifiCorp's existing coal plants and upcoming new capital expenditures at those coal plants.

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

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

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7. Travis Ritchie (CA Bar No. 258084) is an attorney in good standing and licensed to practice law in California. Mr. Ritchie is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-100-6(b).

WHEREFORE, Sierra Club requests leave to intervene in this proceeding to protect its interests and the interests of its members as they may appear.

DATED this 3rd day of March 2017.

Respectfully submitted,

/s/ Travis Ritchie

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