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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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Investigation of Revenue Requirement Impacts of the New Federal Tax Legislation Titled: “An act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018”	Docket No. 17-035-69  <b>Petition to Intervene of Utah Industrial Energy Consumers</b>
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The “Utah Industrial Energy Consumers”<sup>1</sup> (“UIEC”) file this Petition, consistent with Utah Code § 63G-4-207 and Utah Administrative Code Rule R746-1-108, for leave to intervene in the above-captioned 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 December 21, 2017, the Utah Public Service Commission (“PSC” or the “Commission”) opened this investigatory docket to “investigate the revenue requirement impacts

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<sup>1</sup> For purposes of this Petition to Intervene, the UIEC is a reference, for convenience only, of Tesoro Refining & Marketing Company LLC, LafargeHolcim Ltd., and Post Consumer Brands, LLC.

of the new federal tax legislation titled: ‘An act to provide for reconciliation pursuant to Titles II and V of the concurrent resolution of the budget for fiscal year 2018.’”

2. Since that time, the Commission issued a scheduling order setting Monday, April 16, 2018, as the deadline for intervention.

3. Each of the petitioners referred to as the UIEC are industrial consumers and customers of RMP.

4. 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 Rocky Mountain Power’s (“RMP” or the “Company”) application for approval of proposed Tariff Schedule 197 and the Company’s excess accumulated deferred income taxes (“ADIT”) that resulted from the Tax Cut and Jobs Acts of 2017 (“TCJA”).

5. 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.

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

8. The UIEC have not yet determined the specific positions, level of their participation, or the precise nature of the relief the UIEC will seek, though they will likely at the very least advocate for return to Utah ratepayers of the entire \$76.2 million reduction in current income tax obligations and excess unprotected ADIT as soon as possible. UIEC seek 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 full extent allowed by the law.

DATED this 9th day of April 2018

/s/ Vicki M. Baldwin  
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WILLIAM J. EVANS  
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CHAD C. BAKER  
PARSONS BEHLE & LATIMER  
Attorneys for UIEC, an Intervention Group

**CERTIFICATE OF SERVICE**

(Docket No. 17-035-69)

I hereby certify that on this 9th day of April 2018, I caused to be e-mailed, a true and correct copy of the foregoing PETITION TO INTERVENE OF UTAH INDUSTRIAL ENERGY CONSUMERS to:

ASSISTANT ATTORNEYS GENERAL

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/s/ Lexi Deal \_\_\_\_\_