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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Rocky Mountain
Power's Application to Increase the
Deferred EBA Rate through the Energy
Balancing Account Mechanism

Docket No. 18-035-01

**Petition to Intervene of Utah Industrial
Energy Consumers**

The "Utah Industrial Energy Consumers"¹ ("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 March 15, 2018, Rocky Mountain Power ("RMP" or "Company") filed an Application with the Utah Public Service Commission ("PSC" or the "Commission") to increase the deferred EBA rate to recover approximately \$2.8 million in deferred EBA costs.

¹ For purposes of this Petition to Intervene, the UIEC is a reference, for convenience only, of Tesoro Refining & Marketing Company LLC, and LafargeHolcim Ltd.

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

4. Each of the petitioners has a direct, immediate, and substantial interest in this proceeding because the rate it pays for electric service may be affected by a Commission decision on the application to recover deferred EBA costs.

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. The 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 19th day of April 2018.

/s/ William J. Evans

WILLIAM J. EVANS

VICKI M. BALDWIN

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PARSONS BEHLE & LATIMER

Attorneys for UIEC, an Intervention Group

CERTIFICATE OF SERVICE

(Docket No. 18-035-01)

I hereby certify that on this 19th 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:

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