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Counsel for Sierra Club

STATE OF UTAH

Public Service Commission

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR
AUTHORITY TO CHANGE ITS
DEPRECIATION RATES EFFECTIVE
JANUARY 1, 2021

Docket No. 18-035-36

**SIERRA CLUB
PETITION TO INTERVENE**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, Sierra Club hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Sierra Club is a national non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene in this proceeding on behalf of itself and its more than 5,300 members who live and purchase utility services in Utah, most of whom are residential customers of Rocky Mountain Power.

2. The interests of 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 and directly affected by this proceeding because Rocky Mountain Power's requested changes to depreciation rates and expenses may ultimately impact their bills and the resource mix that Rocky Mountain Power uses to generate electricity.

4. Sierra Club has not fully determined the specific positions it will take or the relief it will seek. Sierra Club 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 the public health, environmental, and economic impacts of Rocky Mountain Power's proposed depreciation rate changes. These interests are directly related to the subjects addressed in Rocky Mountain Power's application, namely the appropriate depreciation schedules and rates for Rocky Mountain Power. Sierra Club may also address other issues that arise in this proceeding.

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. Sierra Club requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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7. Matthew Gerhart (CO Bar No. 50908) and Marta Darby (CA Bar No. 310690) are both attorneys in good standing and licensed to practice law in Colorado and California, respectively. Mr. Gerhart and Ms. Darby also are full-time employees of Sierra Club. Therefore, under Rule R746-1-107, Mr. Gerhart and Ms. Darby are authorized to represent Sierra Club's interests in this proceeding.¹

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

DATED this 31st day of October, 2018.

Respectfully submitted,

¹ Pursuant to Rule R746-1-107, certificates of good standing for Mr. Gerhart and Ms. Darby are attached to this Petition.



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Attorneys for Sierra Club



Supreme Court of California

JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court

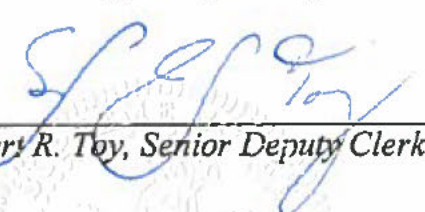
**CERTIFICATE OF THE CLERK OF THE SUPREME COURT
OF THE
STATE OF CALIFORNIA**

MARTA RENEE DARBY


I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that MARTA RENEE DARBY, #310690, was on the 19th day of AUGUST, 2016, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 31st day of October 2018.*

JORGE E. NAVARRETE
Clerk/Executive Officer of the Supreme Court

By: 
Robert R. Toy, Senior Deputy Clerk

SUPREME COURT



State of Colorado

STATE OF COLORADO, ss:

I, Cheryl Stevens Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Matthew Evan Gerhart

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the _____^{6th}

day of June A. D. 2017 and that at the date hereof

the said Matthew Evan Gerhart

is in good standing at this Bar.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

29th day of October A. D. 2018

Cheryl Stevens

Clerk

By



Deputy Clerk



STATE OF UTAH
Public Service Commission

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JANUARY 1, 2021

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CERTIFICATE OF SERVICE

I CERTIFY that on October 31, 2018, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

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Erika Tedder
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By USPS:

Office of Consumer Services
160 East 300 South, 2nd Floor
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Dated this 31st day of October, 2018 at Oakland, CA.

/s/ Ana Boyd

Ana Boyd
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