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Counsel for Utah Association of Energy Users

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement	Docket No. 19-035-42
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PETITION TO INTERVENE OF THE UTAH ASSOCIATION OF ENERGY USERS

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Utah Association of Energy Users (“Petitioner” or “UAE”) hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is an organization that represents large Utah electric consumers who are customers of Rocky Mountain Power or whose rates are affected by Rocky Mountain Power’s rate structure.
2. The legal rights and interests of Petitioner and its members may be substantially affected by this proceeding.
3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner 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 large electric customers.

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

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

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WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 20th day of December, 2019.

Respectfully submitted,



By: _____

Phillip J. Russell
HATCH, JAMES & DODGE, P.C.
Attorneys for UAE

Certificate of Service
Docket No. 19-035-42

I hereby certify that a true and correct copy of the foregoing was served by email this 20th day of December, 2019, on the following:

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/s/ Phillip J. Russell