

Sophie Hayes (12546)
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Attorney for Western Resource Advocates

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 PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES
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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a non-profit conservation organization dedicated to protecting the land, air, and water of the West. WRA’s Clean Energy Program develops and implements policies to reduce environmental impacts of the electric power industry in the Interior West by advocating for a western electric system that provides affordable and reliable energy, reduces economic risks, and protects the environment through the expanded use of energy efficiency, renewable energy resources, and other clean energy technologies. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are ratepayers with PacifiCorp, doing business in Utah as Rocky Mountain Power. WRA has participated in electric utility proceedings for over 20 years and has been granted intervenor status in multiple Utah Commission dockets.

2. WRA's legal rights and interests will be substantially affected by this proceeding. WRA has participated in PacifiCorp's multi-state cost allocation Broad Review Work Group and settlement negotiation processes, and is a signatory to the 2020 Inter-jurisdictional Cost Allocation Agreement. WRA requests that its intervention be granted and that it be given party status in this proceeding.

3. WRA has not determined specific positions it will take or the relief it will seek. WRA seeks to intervene for purposes of protecting its interests as they arise.

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

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

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6. WRA also requests that the following name be added to the electronic service list for this docket: Callie Hood (callie.hood@westernresources.org).

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Dated this 16th day of January 2020.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in black ink, appearing to read 'SHAYES', written over a horizontal line.

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