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Utah Clean Energy  
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*Attorney for Utah Clean Energy*

**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 Utah Clean Energy**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-1-108, Utah Clean Energy respectfully petitions the Public Service Commission (“Commission”) for leave to intervene in this docket regarding Rocky Mountain Power’s application for approval of the 2020 inter-jurisdictional cost allocation agreement:

1. Utah Clean Energy is a state-based, non-profit, public interest organization working to create healthy, thriving communities empowered and sustained by clean energy. Our mission is to lead and accelerate the clean energy transformation with vision and expertise. Our work focuses on preventing wasted energy, facilitating clean energy, and creating a smart energy future.

2. Utah Clean Energy’s legal rights and interests will be substantially affected by this proceeding. Utah Clean Energy participated in PacifiCorp’s Broad Review Work Group and is a signatory to the 2020 inter-jurisdictional cost allocation agreement.

3. Utah Clean Energy has not fully determined specific positions it will take or the relief it will seek. Utah Clean Energy 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 Utah Clean Energy to intervene.

6. If Utah Clean Energy is granted leave to intervene in this proceeding, notices should be sent to the following:

Hunter Holman  
UTAH CLEAN ENERGY  
1014 2nd Avenue  
Salt Lake City, UT 84103  
801-363-4046  
hunter@utahcleanenergy.org

WHEREFORE, Utah Clean Energy requests leave to intervene in this proceeding to protect its interests as they may arise.

DATED this 5th day of March 2020.

Respectfully submitted,

/s/ Hunter Holman

Hunter Holman  
*Attorney for Utah Clean Energy*

**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 5th day of March 2020, on the following:

**ROCKY MOUNTAIN POWER**

Jana Saba	jana.saba@pacificorp.com
Utah dockets	utahdockets@pacificorp.com
Data Request Response Center	datarequest@pacificorp.com

**DIVISION OF PUBLIC UTILITIES**

Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
DPU Data Request	dpudatarequest@utah.gov

**OFFICE OF CONSUMER SERVICES**

Robert Moore	rmoore@agutah.gov
Michele Beck	mbeck@utah.gov
Victor Copland	vcopeland@agutah.gov

**UTAH ASSOCIATION OF ENERGY USERS**

Phillip J. Russel	prussell@hjdllaw.com
Gary Dodge	gdodge@hjdllaw.com
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**NUCOR STEEL-UTAH**

Peter J. Mattheis	pjm@smxblaw.com
Eric J. Lacey	ejl@smlblaw.com
Jeremy R. Cook	jcook@chnekinghorn.com

**WESTERN RESOURCE ADVOCATES**

Sophie Hayes	sophie.hayes@westernresources.org
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*/s/ Hunter Holman*

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