

Sophie Hayes (12546)
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Attorney for Western Resource Advocates

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF ROCKY MOUNTAIN POWER’S PROPOSED TARIFF REVISIONS TO ELECTRIC SERVICE SCHEDULE NO. 140, NON-RESIDENTIAL ENERGY EFFICIENCY	Docket No. 19-035-T01 PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES
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Pursuant to Utah Code Ann. § 63G-4-207, Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, and the Commission’s March 14, 2019 Scheduling Order and Notice of Technical Conference, 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. Western Resource Advocates is a member of PacifiCorp's Utah demand-side management steering committee.

2. WRA's legal rights and interests will be substantially affected by this proceeding. This tariff proceeding will affect the energy efficiency program offerings available to PacifiCorp's non-residential customers in Utah. WRA's interest is related to promoting energy efficiency and ensuring the utility offers a demand-side management program that is in the public interest. To enable WRA to effectively analyze and assess these issues, and to provide intervenor expertise and input, 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 18th day of March 2019.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES



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