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**COUNSEL FOR THE KROGER CO.**

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power ) for Authority to Increase its Retail Electric Utility Service ) Rates in Utah and for Approval of its Proposed Electric ) Service Schedules and Electric Service Regulations )	<b>Docket No. 20-035-04</b>  <b>THE KROGER CO.'s PETITION TO INTERVENE</b>
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Pursuant to Utah Code Ann. §63G-4-207 and Utah Admin. Code Rule R746-1-108, The Kroger Co. (“Kroger” or “Petitioner”) hereby petitions the Public Service Commission of Utah (“Commission”) for leave to intervene and participate in the proceeding concerning the application of Rocky Mountain Power Company (“Applicant”).

In support of its Petition The Kroger Co. states as follows:

1. On May 8, 2020 Applicant filed its general rate case in the above-referenced docket.
2. Petitioner operates numerous grocery stores, a distribution center, a dairy, a bakery and other facilities in the service territory of the Applicant. In total, Kroger has approximately 80 accounts on the Applicants system. The rate increase requested by the Applicant, if approved, would result in significant added cost to the Petitioner.
3. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

4. Kroger requests that copies of all notices and filings in this docket be served on:

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WHEREFORE, The Kroger Co. respectfully requests that the Commission enter an Order granting its Petition to Intervene in this docket allowing The Kroger Co. to participate to the full extent allowed by law.

Dated this 27<sup>th</sup> day of May, 2020.

*/s/ Kurt J. Boehm*  
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**COUNSEL FOR THE KROGER CO.**

## CERTIFICATE OF SERVICE

I certify that on May 27, 2020, a true and correct copy of the foregoing was delivered via email upon the following:

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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