

Irion A. Sanger  
Joni Sliger  
Sanger Law, PC  
1041 SE 58th Place  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
[irion@sanger-law.com](mailto:irion@sanger-law.com)  
[joni@sanger-law.com](mailto:joni@sanger-law.com)

*Counsel for Stadion LLC*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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	Docket No. 20-035-04
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**PETITION TO INTERVENE OF STADION LLC**

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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Stadion LLC (“Stadion”) hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Stadion is a limited liability company that is wholly-owned by Facebook, Inc. Stadion owns and operates a large data center in Eagle Mountain City, Utah (the “Data Center”). The Data Center is within the service territory of, and purchases power from, Rocky Mountain Power.

2. Stadion has a direct and substantial interest in Rocky Mountain Power’s 2020 General Rate Case (“GRC”) because the issues in the case could have a direct and substantial

impact on Stadion and its electric rates. Specifically, Rocky Mountain Power has proposed a general rate increase of approximately \$95.8 million or 4.8 percent, the early closure of Cholla Unit 4, and the amortization of deferred tax benefits. Stadion purchases power for the Data Center from Rocky Mountain Power under a contract pursuant to the Schedule 34 approved by this Commission. Without intervention, Stadion would not have the ability to participate in the proceeding, which could result in material harm. For these reasons, the legal rights and interests of Stadion are substantially affected by this proceeding.

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

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Stadion to intervene. Stadion's intervention will assist the Public Service Commission of Utah (the "Commission") in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, Stadion's interest is not adequately represented by any other party in this proceeding.

5. This filing is timely filed. In the scheduling order issued June 9, 2020, the Commission adopted deadlines for filing petitions for intervention on various issues of either September 8, 2020 or September 17, 2020, and the date of filing this petition is July 14, 2020.

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

Irion A. Sanger  
Joni Sliger  
Sanger Law, PC  
1041 SE 58th Place  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
[irion@sanger-law.com](mailto:irion@sanger-law.com)  
[joni@sanger-law.com](mailto:joni@sanger-law.com)

And electronic service only to:

Bryce Dalley: [rbd@fb.com](mailto:rbd@fb.com)

Brian Dickman: [bdickman@newgenstrategies.net](mailto:bdickman@newgenstrategies.net)

7. Irion Sanger and Joni Sliger are counsel for Stadion, and are licensed as attorneys in a foreign state. Mr. Sanger and Ms. Sliger are providing the Commission with certificates of good standing from Oregon pursuant to R746-1-107. Attachment A to this Petition to Intervene includes the certificates of good standing from Oregon.

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

DATED this 14th day of July 2020.

Respectfully submitted,

Sanger Law, PC



Irion A. Sanger

Joni Sliger

Sanger Law, PC

1041 SE 58th Place

Portland, OR 97215

Telephone: 503-756-7533

Fax: 503-334-2235

[irion@sanger-law.com](mailto:irion@sanger-law.com)

[joni@sanger-law.com](mailto:joni@sanger-law.com)

Of Attorneys for Stadion LLC

**Attachment A**

**Certificates of Good Standing**

## Certificate of Good Standing

State of Oregon            )  
  ) ss.  
County of Washington    )

I, Stacy R. Owen, do hereby certify that I am an Assistant Disciplinary Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

**IRION A. SANGER**

was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on October 4, 2000.

There are no grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Mr. Sanger is an active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 5<sup>th</sup> day of May, 2020.



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Stacy R. Owen  
Assistant Disciplinary Counsel  
Oregon State Bar

## Certificate of Good Standing

State of Oregon            )  
  ) ss.  
County of Washington    )

I, Angela W. Bennett, do hereby certify that I am an Assistant Disciplinary Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

**JONI SLIGER**

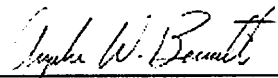
was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on March 23, 2018.

There are no grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Ms. Sliger is an active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 9<sup>th</sup> day of July, 2020.



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Angela W. Bennett  
Assistant Disciplinary Counsel  
Oregon State Bar

Certificate of Service  
**Docket No. 20-035-04**

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served by email this 14th day of July 2020 on the following:

Data Request Response Center ([datareq@pacificorp.com](mailto:datareq@pacificorp.com), [utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))  
PacifiCorp

Jana Saba ([jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com))  
Emily Wegener ([emily.wegener@pacificorp.com](mailto:emily.wegener@pacificorp.com))  
Jacob McDermott ([jacob.mcdermott@pacificorp.com](mailto:jacob.mcdermott@pacificorp.com))  
Rocky Mountain Power

D. Matthew Moscon ([matt.moscon@stoel.com](mailto:matt.moscon@stoel.com))  
Lauren Shurman ([lauren.shurman@stoel.com](mailto:lauren.shurman@stoel.com))  
Stoel Rives LLP

Vicki M. Baldwin ([vbaldwin@parsonsbehle.com](mailto:vbaldwin@parsonsbehle.com))  
Stephen W. Chriss ([stephen.chriss@walmart.com](mailto:stephen.chriss@walmart.com))  
Walmart, Inc.

Phillip J. Russell ([prussell@jdrslaw.com](mailto:prussell@jdrslaw.com))  
James Dodge Russell & Stephens PC

Peter J. Mattheis ([pjm@smxblaw.com](mailto:pjm@smxblaw.com))  
Eric J. Lacey ([ejl@smxblaw.com](mailto:ejl@smxblaw.com))  
Stone Mattheis Xenopoulos & Brew, P.C.

Jeremy R. Cook ([jcook@cohnekinghorn.com](mailto:jcook@cohnekinghorn.com))  
Cohne Kinghorn  
Nucor Steel-Utah, a Division of Nucor Corporation

Sophie Hayes ([sophie.hayes@westernresources.org](mailto:sophie.hayes@westernresources.org))  
Nancy Kelly ([nkelly@westernresources.org](mailto:nkelly@westernresources.org))  
Steven S. Michel ([smichel@westernresources.org](mailto:smichel@westernresources.org))  
Western Resource Advocates

Kurt J. Boehm, Esq. ([kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)) Jody  
Kyler Cohn, Esq. ([jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com))  
Boehm, Kurtz & Lowry

Richard A. Baudino ([rbaudino@jkenn.com](mailto:rbaudino@jkenn.com))  
J. Kennedy & Associates  
The Kroger Co.

Hunter Holman ([hunter@utahcleanenergy.org](mailto:hunter@utahcleanenergy.org))  
Kate Bowman ([kate@utahcleanenergy.org](mailto:kate@utahcleanenergy.org))  
Utah Clean Energy

Roger Swenson ([roger.swenson@prodigy.net](mailto:roger.swenson@prodigy.net))  
US Magnesium, LLC

Patricia Schmid ([pschmid@agutah.gov](mailto:pschmid@agutah.gov))  
Justin Jetter ([jjetter@agutah.gov](mailto:jjetter@agutah.gov))  
Robert Moore ([rmoore@agutah.gov](mailto:rmoore@agutah.gov))  
Victor Copeland ([vcopeland@agutah.gov](mailto:vcopeland@agutah.gov))  
Assistant Utah Attorneys General

Madison Galt ([mgalt@utah.gov](mailto:mgalt@utah.gov))  
Division of Public Utilities

Cheryl Murray ([cmurray@utah.gov](mailto:cmurray@utah.gov))  
Office of Consumer Services



Irion Sanger