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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 ELECTRIC VEHICLE
INFRASTRUCTURE PROGRAM

Docket No. 20-035-34

PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES

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 organization that addresses climate change to sustain the environment, economy, and people of the West. We work with decision-makers and other advocates to advance clean energy, protect air, water, and wildlife—and sustain the lives and livelihoods of the West. Our Clean Energy Program includes policy experts, economists, and attorneys and develops and implements evidence-based solutions to realize the benefits of a decarbonized electricity system that is reliable and economic for customers. WRA also advocates for policies which support beneficial electrification of the transportation sector in order to reduce carbon emissions, improve local air quality, and drive net economic benefits associated with electric transportation. 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 30 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's interest is ensuring that the proposed electric vehicle infrastructure program is just and reasonable, results in prudent and equitable investments in electric vehicle charging infrastructure, and is successful in reducing transportation sector air pollutants and greenhouse gas emissions. 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.
- 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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Aaron Kressig 1536 Wynkoop Street, Suite 210 Denver, CO 80202 720-763-3746 aaron.kressig@westernresources.org

Deborah Kapiloff 2260 Baseline Road, Suite 200 Boulder, CO 80302 720-927-3057 deborah.kapiloff@westernresources.org

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 2nd day of September 2021.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

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