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*Attorney for Western Resource Advocates*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

ROCKY MOUNTAIN POWER'S APPLICATION FOR APPROVAL OF THE 2021 ENERGY BALANCING ACCOUNT	Docket No. 21-035-01 <b>PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES</b>
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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 31, 2021 Scheduling Order and Notice of Hearing, 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 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 may be substantially affected by this proceeding. WRA's interests are related to the economics and economic risks associated with PacifiCorp's generation resources, including fuel costs associated with those resources. To enable WRA to effectively analyze and assess the issues, 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 names 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 17<sup>th</sup> day of May 2021.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in black ink, appearing to read 'SHAYES', written over a horizontal line.

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