

Phillip J. Russell (10445)
JAMES DODGE RUSSELL & STEPHENS PC
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: prussell@jdrsllaw.com

Attorneys for Utah Association of Energy Users

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

PacifiCorp's 2021 Integrated Resource Plan

Docket No. 21-035-09

**PETITION TO INTERVENE OF THE
UTAH ASSOCIATION OF ENERGY USERS**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Utah Association of Energy Users ("Petitioner" or "UAE") hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner is an organization that represents large Utah electric consumers who are customers of Rocky Mountain Power or whose rates are affected by Rocky Mountain Power's rate structure.
2. The legal rights and interests of Petitioner and its members may be substantially affected by this proceeding.
3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for the purposes of protecting its interests and the

interests of its members as they may appear, particularly on issues of relevance to large electric customers.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.

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

Phillip J. Russell
JAMES DODGE RUSSELL & STEPHENS, P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: prussell@jdrsllaw.com

Don Hendrickson
Energy Strategies, LLC
111 East Broadway, Suite 1200
Salt Lake City, Utah 84111
Telephone: (801) 355-4365
Email: dhendrickson@energystrat.com

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

DATED this 21st day of September 2021.

Respectfully submitted,

By:



Phillip J. Russell
JAMES DODGE RUSSELL & STEPHENS, P.C.

Attorneys for UAE

Certificate of Service
Docket No. 21-035-09

I hereby certify that a true and correct copy of the foregoing was served by email on September 21, 2021 on the following:

ROCKY MOUNTAIN POWER

Emily Wegener	emily.wegener@pacificorp.com
Jana Saba	jana.saba@pacificorp.com
	irp@pacificorp.com
	Datarequest@pacificorp.com

DIVISION OF PUBLIC UTILITIES

Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Madison Galt	mgalt@utah.gov
Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
	dpudatarequest@utah.gov

OFFICE OF CONSUMER SERVICES

Michele Beck	mbeck@utah.gov
Bela Vastag	bvastag@utah.gov
Alyson Anderson	akanderson@utah.gov
Alex Ware	aware@utah.gov
Robert Moore	rmoore@agutah.gov
	ocs@utah.gov

WESTERN RESOURCE ADVOCATES

Sophie Hayes	sophie.hayes@westernresources.org
Nancy Kelly	nkelly@westernresources.org
Steven S. Michel	smichel@westernresources.org
Callie Hood	callie.hood@westernresources.org

UTAH CLEAN ENERGY

Kate Bowman	kate@utahcleanenergy.org
Hunter Holman	hunter@utahcleanenergy.org

FERVO ENERGY COMPANY

Sarah Jewett	sarah@fervoenergy.com
Dawn Owens	dawn@fervoenergy.com

INTERWEST ENERGY ALLIANCE

Lisa Tormoen Hickey lisahickey@newlawgroup.com

Nate Blouin nate@interwest.com

/s/ Phillip J. Russell _____