Sara Montoya (14264) Salt Lake City Attorney's Office 451 S. State Street, Suite 505A P.O. Box 145478 Salt Lake City, Utah 84114-5478

Telephone: (801) 535-7685 Facsimile: (801) 535-7640

Email: Sara.Montoya@slcgov.com

Counsel for Salt Lake City Corporation

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF PACIFICORP'S 2021 INTEGRATED RESOURCE PLAN

Docket No. 21-035-09

## PETITION TO INTERVENE OF SALT LAKE CITY CORPORATION

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Salt Lake

City Corporation ("Petitioner" or "City") hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

- 1. Petitioner is a Utah municipal corporation that serves the interests of many residents and businesses who are customers of Rocky Mountain Power ("RMP").
- 2. The legal rights and interests of Petitioner and its citizens 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 citizens 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 Petitioner to intervene.
- 5. Petitioner's interests are not adequately represented by another party in this proceeding.
  - 6. Notices in this proceeding should be sent to the following:

Sara Montoya Salt Lake City Attorney's Office 451 S. State Street P.O. Box 145478 Salt Lake City, Utah 84114-5478 Telephone: (801) 535-7685

Facsimile: (801) 363-6666 Email: sara.montoya@slcgov.com

Christopher Thomas
Salt Lake City Department of Sustainability
451 S. State St. Room 404
P.O. Box 145467
Salt Lake City, UT 84114-5467
(385) 228-6873
christopher.thomas@slcgov.com

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

DATED this 14th day of March 2022.

SALT LAKE CITY CORPORATION

/s/ \_Sara Montoya \_\_\_\_\_ Attorney for Salt Lake City Corporation

# CERTIFICATE OF SERVICE

## Docket No. 21-035-09

I hereby certify that a true and correct copy of the foregoing was served by email this 14<sup>th</sup> day of March 2022, on the following:

## ROCKY MOUNTAIN POWER

Emily Wegener emily.wegener@pacificorp.com
Jana Saba jana.saba@pacificorp.com
Utah dockets utahdockets@pacificorp.com
Data Request Response Center datarequest@pacificorp.com

## **DIVISION OF PUBLIC UTILITIES**

Patricia Schmid pschmid@agutah.gov
Justin Jetter jjetter@agutah.gov
William Powell wpowell@utah.gov
DPU Data Request dpudatarequest@utah.gov

## OFFICE OF CONSUMER SERVICES

Steven Snarr stevensnarr@agutah.gov
Robert Moore rmoore@agutah.gov
Michele Beck mbeck@utah.gov

## FERVO ENERGY COMPANY

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

## INTERWEST ENERGY ALLIANCE

Lisa Tormoen Hickey lisahickey@newlawgroup.com

## SALT LAKE CITY CORPORATION

Sara Montoya sara.montoya@slcgov.com Christopher Thomas christopher.thomas@slcgov.com

#### SIERRA CLUB

Rose Monahan rose.monahan@sierraclub.org
Ana Boyd ana.boyd@sierraclub.org

## SOUTHWEST ENERGY EFFICIENCY PROJECT

Justin Brant jbrant@swenergy.org

## UTAH ASSOCIATION OF ENERGY USERS

Phillip Russel prussel@jdrslaw.com

Don Hendrickson dhendrickson@energystrat.com

## **UTAH CLEAN ENERGY**

Hunter Holman hunter@utahcleanenergy.org
Thomas Kessinger thomas@utahcleanenergy.org

## WESTERN RESOURCE ADVOCATES

Sophie Hayessophie.hayes@westenresources.orgNancy Kellynkelly@westernresources.orgSteven S. Michelsmichel@westernresources.orgCallie Hoodcallie.hood@westernresources.org

**WALMART** 

Vicki Baldwinvbaldwin@parsonsbehle.comAndrew TeagueAndrew.Teague@walmart.comStephen ChrissStephen.chriss@walmart.com

/s/ Christopher Thomas