

Phillip J. Russell (10445)  
JAMES DODGE RUSSELL & STEPHENS, P.C.  
10 West Broadway, Suite 400  
Salt Lake City, Utah 84101  
Telephone: (801) 363-6363  
Facsimile: (801) 363-6666  
Email: prussell@jdrsllaw.com

*Counsel for Utah Association of Energy Users*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

Application of Rocky Mountain Power to Establish a Balancing Account for Pension Settlement Adjustments	Docket No. 21-035-14
---	----------------------

**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@jdrslaw.com

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

DATED this 18th day of March 2021.

Respectfully submitted,

By:



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

*Attorneys for UAE*

Certificate of Service  
Docket No. 21-035-14

I hereby certify that a true and correct copy of the foregoing was served by email this 18th day of March 2021 on the following:

ROCKY MOUNTAIN POWER

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

DIVISION OF PUBLIC UTILITIES

Chris Parker	chrisparker@utah.gov
William Powell	wpowell@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
Robert Moore	rmoore@agutah.gov

/s/ Phillip J. Russell