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COUNSEL FOR THE KROGER CO.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

Docket No. 21-035-16

Collaborative Stakeholder Process for Rocky
Mountain Power’s Grid Modernization and Rate
Design)
)
)
)

**THE KROGER CO.’s
PETITION TO INTERVENE**

Pursuant to Utah Code Ann. §63G-4-207 and Utah Admin. Code Rule R746-1-108, The Kroger Co. (“Kroger” or “Petitioner”) hereby petitions the Public Service Commission of Utah (“Commission”) for leave to intervene and participate in the proceeding concerning the Rocky Mountain Power Company (“Company”).

In support of its Petition, Kroger states as follows:

1. The Commission initiated this docket on March 17, 2021, for the purpose of establishing a collaborative stakeholder process related to grid modernization and rate design.
2. Kroger operates numerous grocery stores, a distribution center, a dairy, a bakery and other facilities in the service territory of the Company. In total, Kroger has approximately 80 accounts on the Company’s system.

3. Kroger has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party because Kroger intends to advocate for an aggregate/conjunctive billing rate design for Schedule 6 customers.
4. Kroger requests that copies of all notices and filings in this docket be served on:

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WHEREFORE, The Kroger Co. respectfully requests that the Commission enter an Order granting its Petition to Intervene in this docket allowing The Kroger Co. to participate to the full extent allowed by law.

Dated this 14th day of July, 2021.

/s/ Kurt J. Boehm
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CERTIFICATE OF SERVICE

I certify that on July 14th 2021 a true and correct copy of the foregoing was delivered via email upon the following:

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

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