

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

Attorneys for Utah Association of Energy Users

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for 2022 All Source Request for Proposals	Docket No. 21-035-52
---	----------------------

**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

Kevin C. Higgins
Energy Strategies LLC
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
Telephone: (801) 355-4365
Email: khiggins@energystrat.com

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

DATED this 27th day of October, 2021.

Respectfully submitted,

By: 

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

Attorneys for UAE

Certificate of Service
Docket No. 21-035-52

I hereby certify that a true and correct copy of the foregoing was served by email this 27th day of October 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
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

INTERWEST ENERGY ALLIANCE

Lisa Tormoen Hickey lisahickey@newlawgroup.com
Nate Blouin nate@interwest.org

/s/ Phillip J. Russell _____