

Sophie Hayes (12546)
Western Resource Advocates
307 West 200 South, Suite 2000
Salt Lake City UT 84101
801-212-9419
sophie.hayes@westernresources.org

Attorney for Western Resource Advocates

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electricity Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations	DOCKET NO. 24-035-04 <u>PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES</u>
--	--

Pursuant to Utah Code Ann. § 63G-4-207 and R746-1-108 of the Public Service Commission (“Commission”) Rules, Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a non-profit organization that addresses climate change to sustain the environment, economy, and people of the West. We work with decision-makers and other advocates to advance clean energy, protect air, water, and wildlife—and sustain the lives and livelihoods of the West. Our Clean Energy Department includes policy experts, economists, and attorneys and develops and implements evidence-based solutions to realize the benefits of a decarbonized electricity system that is reliable and economic for customers. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are ratepayers with PacifiCorp, doing business in Utah as Rocky Mountain Power. WRA has

participated in electric utility proceedings for 30 years and has been granted intervenor status in multiple Utah Commission dockets.

2. WRA's legal rights and interests may be substantially affected by this proceeding.

3. WRA has not determined specific positions it will take or the relief it will seek.

WRA seeks to intervene for purposes of protecting its interests as they arise.

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

5. WRA requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Sophie Hayes
Western Resource Advocates
307 West 200 South, Suite 2000
Salt Lake City, UT 84101
801-212-9419
sophie.hayes@westernresources.org

Karl Boothman
Western Resource Advocates
307 West 200 South, Suite 2000
Salt Lake City, UT 84101
385-295-8182
karl.boothman@westernresources.org

Nancy Kelly
Western Resource Advocates
9463 North Swallow Road
Pocatello, ID 83201
208-904-0488
nancy.kelly@westernresources.org

Jessica Loeloff
Western Resource Advocates
307 West 200 South, Suite 2000
Salt Lake City, UT 84101
801-903-1374
jessica.loeloff@westernresources.org

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Dated this 25th day of March, 2024.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in black ink, appearing to read 'SHAYES', written over a horizontal line.

Sophie Hayes
Utah Clean Energy Manager/Senior Attorney
801-212-9419
sophie.hayes@westernresources.org
Western Resource Advocates

CERTIFICATE OF SERVICE
Docket No. 24-035-04

I hereby certify that a true and correct copy of the foregoing was served by email this 25th day of March 2024 on the following:

Rocky Mountain Power

Joseph Dallas

joseph.dallas@pacificorp.com

Jana Saba

jana.saba@pacificorp.com

Carla Scarsella

carla.scarsella@pacificorp.com

Ajay Kumar

ajay.kumar@pacificorp.com

datarequest@pacificorp.com

utahdockets@pacificorp.com

Division of Public Utilities

Madison Galt

mgalt@utah.gov

Chris Parker

chrisparker@utah.gov

Patrick Grecu

pgrecu@agutah.gov

Patricia Schmid

pschmid@agutah.gov

dpudatarequest@utah.gov

Office of Consumer Services

Michele Beck

mbeck@utah.gov

Robert Moore

rmoore@agutah.gov

Bela Vastag

bvastag@utah.gov

Alyson Anderson

akanderson@utah.gov

Alex Ware

aware@utah.gov

Jacob Zachary

jzachary@utah.gov

ocs@utah.gov

Utah Association of Energy Users

Phillip J. Russell

prussell@jdrsllaw.com

Kevin Higgins

khiggins@energystrat.com

Neal Townsend

ntownsend@energystrat.com

Shantell Garrett

sgarrett@energystrat.com

Western Resource Advocates

Sophie Hayes

sophie.hayes@westernresources.org

Karl Boothman

karl.boothman@westernresources.org

Jessica Loeloff

jessica.loeloff@westernresources.org

Nancy Kelly

nancy.kelly@westernresources.org

/s/ Jessica Loeloff