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

Investigation Re: Open Market Operations

DOCKET NO. 24-035-10

<u>PETITION FOR LEAVE TO INTERVENE</u> OF WESTERN RESOURCE ADVOCATES

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

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WHEREFORE, WRA respectfully requests that the Commission grant its petition for

leave to intervene in this proceeding.

Dated this 22nd day of March, 2024.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

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

CERTIFICATE OF SERVICE Docket No. 24-035-10

I hereby certify that a true and correct copy of the foregoing was served by email this 22nd day of March 2024 on the following:

Rocky Mountain Power

Joseph Dallas Jana Saba Carla Scarsella Ajay Kumar

Division of Public Utilities

Madison Galt Chris Parker Patrick Grecu Patricia Schmid

Office of Consumer Services

Michele Beck Robert Moore Bela Vastag Alyson Anderson Alex Ware Jacob Zachary

Utah Association of Energy Users

Phillip J. Russell Kevin Higgins Neal Townsend Shantell Garrett

Western Resource Advocates

Sophie Hayes Karl Boothman Jessica Loeloff Nancy Kelly

/s/ Jessica Loeloff

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