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Attorneys for the Utah Large Customer Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Application of Rocky Mountain Power for Approval of the 2026 Inter-Jurisdictional Cost Allocation Protocol Docket No. 25-035-47

PETITION FOR LEAVE TO INTERVENE OF THE UTAH LARGE CUSTOMER GROUP

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, the Utah Large Customer Group ("UTLCG") files this Petition For Leave To Intervene in the above-captioned docket. In support of this Petition, the UTLCG states the following:

- 1. The UTLCG is an unincorporated association of certain Rocky Mountain Power ("RMP" or the "Company") Schedule 9 customers in the State of Utah.
- 2. As among RMP's Schedule 9 customers, UTLCG members receive and pay for electric service from RMP.
- 3. On August 5, 2025, RMP filed its application in the above-captioned docket, seeking approval of its proposed 2026 multi-state cost allocation protocol. RMP's proposal, if adopted, is projected to increase Utah allocated revenue requirement by approximately \$23.5 million. The Company notes that it will seek deferral of this cost allocation difference for potential recovery in a future rate case. The revenue requirement increase is largely due to proposed changes

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to address Washington Climate Commitment Act requirements and, specifically, the impacts of reallocating the Chehalis generation unit to Washington and removing the Hermiston generation unit from Washington rates.

- 4. Further, RMP leaves many cost allocation issues unresolved, including decommissioning costs, fixed allocation of resources, market-based settlements for net power costs, transmission allocations, and potential reallocation of additional resources to comply with state mandates. The Company asserts that its proposed reallocation in this case does not materially impact resource adequacy. RMP seeks an order from the Commission approving these significant changes by no later than December 31, 2025.
- 5. Any new inter-state cost allocation methodology, if approved, will have a direct and substantial impact on the electric rates UTLCG's members pay for service, as well as the reliability and quality of the electric services UTLCG members receive from RMP. Accordingly, UTLCG members' legal rights and interests will be substantially affected by this proceeding.
- 6. The UTLCG has not fully determined the specific positions it will take, or the relief it will seek. The UTLCG seeks to intervene for the purpose of protecting its interests and the interests of its members as they may appear, particularly on issues relevant to RMP's largest electric customers.
- 7. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing UTLCG to intervene.
 - 8. The UTLCG's Petition is timely.
 - 9. Notices in this proceeding should be sent to the following:

Michelle Brandt King Austin W. Jensen Holland & Hart LLP 555 17th Street, Suite 3200 Denver, CO 80202 mbking@hollandhart.com awjensen@hollandhart.com

And electronic service only to:

Adele Lee: <u>aclee@hollandhart.com</u> Tracy Friel: <u>tlfriel@hollandhart.com</u>

10. Counsel for the UTLCG, Austin W. Jensen, is licensed as an attorney in a foreign state. Mr. Jensen is providing the Commission with certificates of good standing pursuant to R746-1-107.¹ Attachment A to this Petition to Intervene includes the certificates of good standing from those jurisdictions where counsel Mr. Jensen is admitted.

WHEREFORE, the UTLCG respectfully requests leave to intervene in this proceeding as a full party to protect its interests and the interests of its members.

DATED this 19th day of August, 2025.

Michelle Brandt King Austin W. Jensen Holland & Hart LLP

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Attorneys for the Utah Large Customer Group

¹ Mr. Jensen's provided certificates of good standing are from Arizona, Colorado, Idaho, New Mexico, Oregon, and Wyoming.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Petition for Leave to Intervene* of the *Utah Large Customer Group*, was served this 19th day of August, 2025, to the following:

Via Email:

ROCKY MOUNTAIN POWER

Ajay Kumar (ajay.kumar@pacificorp.com)

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UTAH LARGE CUSTOMER GROUP

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Aaron Kressig (aaron.kressig@westernresources.org)

Deborah Kapilopp (Deborah.kapiloff@westernresources.org)

/s/ Tracy Friel Tracy Friel

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Petition for Leave to Intervene of the Utah Large Customer Group

Attachment A – Certificates of Good Standing

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF ARIZONA

I, Aaron C. Nash, Clerk of the Supreme Court of the State of Arizona, hereby certify that, according to the records of my office and upon the recommendation of the Disciplinary Clerk of the Supreme Court of Arizona

AUSTIN WARREN JENSEN

was on the 23rd day of March, 2023 duly admitted to practice as an Attorney and Counselor at Law in all the courts of Arizona; that no disciplinary proceedings are pending against this attorney in the Arizona Supreme Court as of the date of this certificate; and that this name now appears on the Roll of Attorneys in this office as an active member of the State Bar of Arizona in good standing.

Given under my hand and the seal of said Court this 16th day of July, 2025.

AARON C. NASH, Clerk

By Om Domues
Ana Ramirez
Deputy Clerk III



Supreme Court

STATE OF ARIZONA
ADMINISTRATIVE OFFICE OF THE COURTS

ANN A. SCOTT TIMMER
CHIEF JUSTICE

DAVID K. BYERS

ADMINISTRATIVE DIRECTOR

OF THE COURTS

CERTIFICATE OF GOOD STANDING ISSUED BY THE DISCIPLINARY CLERK FOR AND ON BEHALF OF THE SUPREME COURT OF ARIZONA

The Disciplinary Clerk, pursuant to Rule 74, Rules of the Supreme Court of Arizona, hereby certifies that according to the records of the State Bar, AUSTIN WARREN JENSEN, was duly admitted to practice as an attorney and counselor at law in all courts of Arizona by the Supreme Court of Arizona on March 23, 2023, and is now, as of the date of this Certificate, an active member of the State Bar of Arizona in good standing.



Given under the seal of the Disciplinary Clerk of the Supreme Court of Arizona this 07-14-2025

Mark McCall

Mark McCall
Associate Disciplinary Clerk

COGS26063F6F01BC



State of Colorado.

STATE OF COLORADO	O, ss:		
I,Cheryl Ste	vens , Clerk of the Su	preme Court of	the State
of Colorado, do hereb	by certify that		
Aus	tin Warren Jensen		
has been duly licensed an	nd admitted to praction	ce as an	
ATTORNEY .	AND COUNS	SELOR AT	LAW
within this State; and the Attorneys	at his/her name app	pears upon the I	Roll of
and Counselors at Law	in my office of date	the 4 th	
day of November	A.D2	2 <u>019</u> and that a	t the date
hereof the said <u>Austin</u>	Warren Jensen	is in go	ood standing
at this Bar.			
RENES COM	IN WITNESS WHERE affixed the Seal of said Supr	reme Court, at Denver,	•
	Cheryl Stevens		
O to COOL	By	This to Mille	Clerk

Deputy Clerk

Supreme Court



State of Idaho

Certificate of Good Standing

Clerk's Office)
) ss.
Supreme Court)

I, Melanie Gagnepain, Clerk of the Supreme Court of the State of Idaho, do hereby certify that AUSTIN WARREN JENSEN, on the 19th day of January 2023, was admitted to practice by said Court as an attorney counselor at law in all the courts of this state, and that ever since and now is an attorney in good standing at the Bar of this Court.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Court at Boise, Idaho, this 29th day of July 2025.

Clerk of the Idaho Supreme Court



IN THE SUPREME COURT OF THE STATE OF NEW MEXICO

Certificate

STATE OF NEW MEXICO	}	
	}	SS
SUPREME COURT	}	

I, ELIZABETH A. GARCIA, Chief Clerk of the Supreme Court of the State of New Mexico, hereby certify that, upon passing a written examination prescribed by the New Mexico Board of Bar Examiners, **AUSTIN WARREN JENSEN** was admitted to practice law in the Supreme Court and other courts of the State of New Mexico on **June 3, 2022**, and has at all times since been and is now an active member of the Bar of said Supreme Court in good standing.

"Good standing" means that the attorney is current on payment of State Bar dues, has complied with Minimum Continuing Legal Education requirements, and is not presently under either administrative or disciplinary suspension. No disciplinary action involving professional misconduct has been taken against the attorney's law license. This certification expires 30 days from this date, unless sooner revoked or rendered invalid by operation of rule or law.



WITNESS, My official signature and the seal of said Court this 24th day of July, 2025.

Elizabeth A. Garcia
Chief Clerk of the Supreme Court
of the State of New Mexico

Bv:	Jessica	Gilmore
BV:	•	•

Deputy Clerk



STATE OF OREGON

SUPREME COURT

SALEM

In the Matter of the Admission of

AUSTIN W. JENSEN

as an Attorney of this Court.

I, as State Court Administrator of the State of Oregon, certify that on the 24^{th} day of February, 2022

AUSTIN W. JENSEN

was admitted to the practice of law in the Supreme Court and all other courts in the State of Oregon, and is now an attorney in good standing.

July 15, 2025.

NANCY COZINE State Court Administrator

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF WYOMING

I, Shawna Goetz, Clerk of the Supreme Court of the State of Wyoming, hereby certify that, according to the records of my office:

Austin Warren Jensen

was, on the 16th day of July, 2024, duly admitted and licensed to practice as an attorney and counselor at law in all the courts of Wyoming; and is currently an active member of the Wyoming State Bar in good standing.

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Given under my hand and the seal of said Court this 14th day of July, 2025.



Shawna Goetz, Clerk