

Rose Monahan (CA Bar #329861)
Sierra Club Environmental Law Program
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Counsel for Sierra Club

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky
Mountain Power for Approval of the 2026
Inter-Jurisdictional Cost Allocation Protocol

Docket No. 25-035-47

SIERRA CLUB PETITION TO INTERVENE

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, Sierra Club hereby petitions for leave to intervene in this docket.

In support of this petition, Sierra Club states as follows:

1. The Sierra Club is a national non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. The Sierra Club petitions to intervene in this proceeding on behalf of itself and more than 4,000 members who live and purchase utility services in Utah, many of whom are residential customers of Rocky Mountain Power (“RMP”).
2. The interests of both the Sierra Club and its members will not be adequately represented by any other party to this proceeding. To the extent the interests of the Sierra Club overlap with any other party, the Sierra Club will coordinate with that party to avoid duplicative efforts.

3. The legal rights and interests of the Sierra Club and its members may be substantially affected by this proceeding.
4. The Sierra Club has not fully determined the specific positions it will take or the recommendations it may make to the Commission. The Sierra Club seeks to intervene for the purposes of protecting the interests of its members, particularly on issues of least-cost, least-risk, and prudent cost allocation amongst RMP's six state jurisdictions. In this proceeding, RMP has proposed reallocating certain resources to Utah, while leaving several cost allocation issues unresolved. The Sierra Club plans to evaluate RMP's filings and analyses to ensure that the Company is fairly and properly allocating costs amongst its six jurisdictions. The Sierra Club intends to explore this and other issues that may arise in the proceeding.
5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the Sierra Club to intervene.
6. Notices in this proceeding should be sent to the following:

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Thomas Phillips
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7. Rose Monahan is an attorney in good standing and licensed to practice law in California (CA Bar No. 329861). Ms. Monahan is a full-time employee of Sierra Club and is therefore authorized to represent Sierra Club's interests in this proceeding pursuant to Rule R746-1-107(a)(ii).¹

WHEREFORE, the Sierra Club requests leaves to intervene in this proceeding to protect its interest and the interests of its members as they may appear.

¹ Pursuant to Rule R746-1-107(a)(ii), a certificate of good standing for Ms. Monahan is attached to this Petition.

DATED this 25th day of August 2025.

Respectfully submitted,

/s/ Rose Monahan

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THE STATE BAR OF CALIFORNIA CERTIFICATE OF STANDING

ISSUE DATE: 8/25/2025

LICENSEE NAME: Rose K. Monahan

LICENSEE BAR NUMBER: 329861

LICENSEE STATUS: Active

ADMIT DATE: 1/7/2020

To Whom it May Concern:

This certificate of standing certifies the record above is a true and correct copy of Rose K. Monahan's current standing with the State Bar of California as of the issue date. No recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

Carolina Almarante-Terrero

Carolina Almarante-Terrero

Custodian of Record

NOTE: Only ACTIVE licensees of the State Bar of California are entitled to practice law in California (See Sections 6006 and 6125, et seq., Business and Professions Code.)

CERTIFICATE OF SERVICE
Docket No. 25-035-47

I hereby certify that a true and correct copy of the foregoing was served by email this 25th day of August, 2025 on the following:

Rocky Mountain Power

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Max Backlund
Katherine Smith

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/s/ Rose Monahan

Dated: August 25, 2025