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*Attorneys for the Utah Large Customer Group*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

Request of Rocky Mountain Power for Approval of a Utah Fire Fund	Docket No. 25-035-61 <b>PETITION FOR LEAVE TO INTERVENE OF THE UTAH LARGE CUSTOMER GROUP</b>
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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 November 26, 2025, RMP filed its request in the above-captioned docket, seeking the Public Service Commission’s approval of its request to create a Utah Fire Fund under Utah Code Ann. §§54-24-301, 302.
4. RMP’s proposed Fire Fund would total \$1.09 billion in accumulated funds after ten years, funded by a customer surcharge that will increase rates 4.48% for each rate class. Under

RMP's proposal, the Company could make withdrawals from the fund after exhausting a deductible to make payments on eligible claims related to damage from a fire event that exceeds RMP's insurance coverage.

5. Any new customer surcharge, if approved, will have a direct and substantial impact on the electric rates UTLCG's members pay for service. Furthermore, the structure of the Fire Fund and RMP's usage of the Fire Fund to pay claims may have a direct and substantial impact on the future reliability and quality of the electric services that 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. No intervention deadline has been set in this proceeding as of the time of filing this Petition. Therefore, the UTLCG's Petition is timely.

9. Notices in this proceeding should be sent to the following:

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[mbking@hollandhart.com](mailto:mbking@hollandhart.com)

[awjensen@hollandhart.com](mailto:awjensen@hollandhart.com)

And electronic service only to:

Adele Lee: [aclee@hollandhart.com](mailto:aclee@hollandhart.com)

Tracy Friel: [tfriel@hollandhart.com](mailto:tfriel@hollandhart.com)

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.<sup>1</sup> 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 5th day of December, 2025.



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*Attorneys for the  
Utah Large Customer Group*

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<sup>1</sup> 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 5th day of December, 2025, to the following:

Via Email:

### ROCKY MOUNTAIN POWER

Carla Scarsella ([carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com))  
Max Backlund ([max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com))  
Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
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### DIVISION OF PUBLIC UTILITIES

Madison Galt ([mgalt@utah.gov](mailto:mgalt@utah.gov))

### UTAH ATTORNEYS GENERAL

Patricia Schmid ([pschmid@agutah.gov](mailto:pschmid@agutah.gov))  
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Robert Moore ([rmoore@agutah.gov](mailto:rmoore@agutah.gov))

### OFFICE OF CONSUMER SERVICES

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### UTAH LARGE CUSTOMER GROUP

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### UTAH ASSOCIATION OF ENERGY USERS

Phillip J. Russell ([prussell@jdrslaw.com](mailto:prussell@jdrslaw.com))  
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*/s/ Tracy Friel* \_\_\_\_\_  
Tracy Friel

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

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*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 23<sup>rd</sup> 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 16<sup>th</sup> day of July, 2025.*

*AARON C. NASH, Clerk*

By *Ana Ramirez*  
*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.

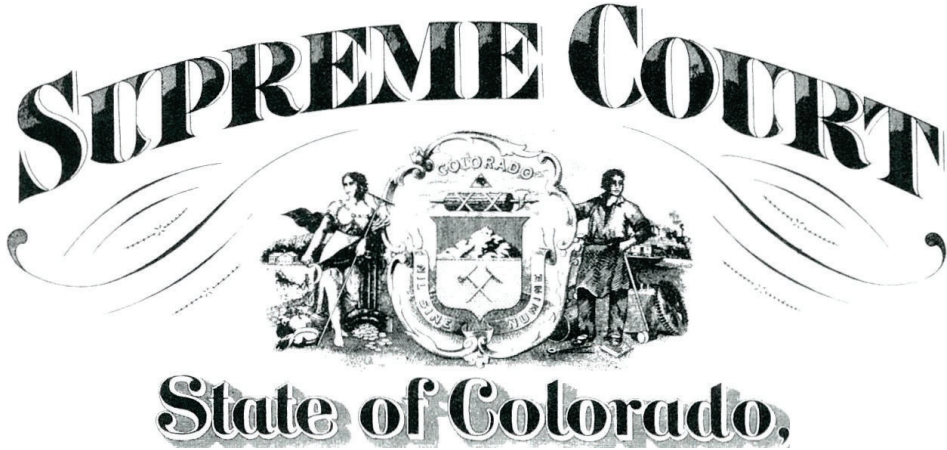


Given under the seal of the Disciplinary  
Clerk of the Supreme Court of Arizona  
this 07-14-2025

*Mark McCall*

Mark McCall  
Associate Disciplinary Clerk

COGS26063F6F01BC



STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Austin Warren Jensen

has been duly licensed and admitted to practice as an

*ATTORNEY AND COUNSELOR AT LAW*

within this State; and that his/her name appears upon the Roll of Attorneys

and Counselors at Law in my office of date the 4<sup>th</sup>

day of November A.D. 2019 and that at the date

hereof the said Austin Warren Jensen is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

16<sup>th</sup> day of July A.D. 2025

**Cheryl Stevens**

Clerk

By *Aristo Miller*

Deputy Clerk





IN THE SUPREME COURT OF THE STATE OF NEW MEXICO

Certificate

STATE OF NEW MEXICO }
}
SUPREME COURT } ss.

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

By: Jessica Gilmore
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<sup>th</sup> 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



  
Authorized Representative

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

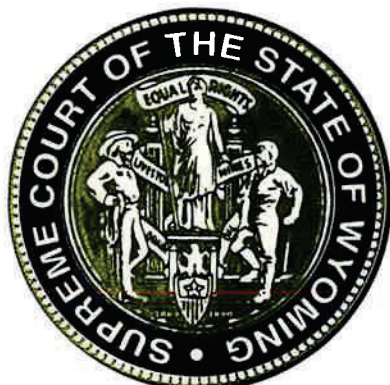
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I, Shawna Goetz, Clerk of the Supreme Court of the State of Wyoming, hereby certify that, according to the records of my office:

**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.

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



  
Shawna Goetz, Clerk