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*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of	)	
Dominion Energy Utah for Approval of	)	Docket No. 19-057-33
A Natural Gas Clean Air Project and	)	
Funding for the Intermountain Industrial	)	<b>PETITION TO INTERVENE OF ROCKY</b>
Assessment Center	)	<b>MOUNTAIN POWER</b>

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Pursuant to Utah Code Ann. § 63g-4-207, and Utah Admin. Code R746-1-108, PacifiCorp, doing business in Utah as Rocky Mountain Power (“RMP”) hereby submits this Petition to Intervene (“Petition”) to the Public Service Commission of Utah (“Commission”) and petitions to intervene in the above captioned docket.

In support of its Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon Corporation that provides electric service to retail customers through its Rocky Mountain Power Division in the States of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California and Washington. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission’s jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 870,000

customers in Utah. Rocky Mountain Power's principal place of business in Utah is 1407 West North Temple, Suite 320, Salt Lake City, Utah 84116.

2. Communications regarding this Application should be addressed to:

Jana Saba  
Utah State Regulatory Affairs Manager  
Rocky Mountain Power  
1407 West north Temple, 330  
Salt Lake City Utah 84116  
Telephone: 801-220-2823  
Email: [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

Jacob A. McDermott  
Senior Attorney  
Rocky Mountain Power  
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Email: [jacob.mcdermott@pacificorp.com](mailto:jacob.mcdermott@pacificorp.com)

In addition, the Company requests that all data requests regarding this matter be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Jana Saba by telephone at 801-220-2823.

3. RMP's legal rights and interests may be substantially affected by this proceeding.
4. RMP has not fully determined the specific positions it will take in this proceeding or the relief it will seek. RMP seeks to intervene for the purpose of protecting its interests, particularly those that relate to the impacts that the program and project proposed by Dominion Energy Utah may have on RMP's provision of electric service to its Utah customers. RMP is further interested in ensuring the accuracy of information related to and resulting from the

proposed STEP program, including related air quality benefit claims, given that many of Dominion Energy Utah's natural gas service customers who will be served by its proposed program are also RMP electric service customers.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by granting this Petition.

WHEREFORE, RMP respectfully requests the Commission grant this Petition to allow RMP to protect its interests in this proceeding as they may arise.

DATED this 18<sup>th</sup> day of February, 2020.

Respectfully submitted,

ROCKY MOUNTAIN POWER

A handwritten signature in black ink, appearing to read "Jacob A. McDermott", written over a horizontal line.

Jacob A. McDermott

*Attorney for Rocky Mountain Power*

**CERTIFICATE OF SERVICE**

Docket No. 19-057-33

I hereby certify that on February 18, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
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**Rocky Mountain Power**

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Mary Penfield  
Adviser, Regulatory Operations