Phillip J. Russell (10445)
JAMES DODGE RUSSELL & STEPHENS P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101

Telephone: (801) 363-6363 Facsimile: (801) 363-6666 Email: prussell@jdrslaw.com

Attorneys for the Utah Association of Energy Users

#### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Dominion Energy Utah for a Subscription-Based Carbon Offset Program

Docket No. 21-057-14

## PETITION TO INTERVENE OF THE UTAH ASSOCIATION OF ENERGY USERS

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Utah Association of Energy Users ("Petitioner" or "UAE") hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

- 1. Petitioner is a trade organization that represents the interests of large utility consumers in the State of Utah, many of whom are gas transportation and/or sales customers of Dominion Energy Utah.
- 2. The legal rights and interests of Petitioner and its members may be substantially affected by this proceeding.
- 3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for the purposes of protecting its interests and the

interests of its members as they may appear, particularly on issues of relevance to large consumers.

- 4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.
  - 5. Notices in this proceeding should be sent to the following:

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JAMES DODGE RUSSELL & STEPHENS P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: prussell@jdrslaw.com

Kevin Higgins
Kelly Francone
Energy Strategies, LLC
111 East Broadway, Suite 1200
Salt Lake City, Utah 84111
Telephone: (801) 355-4365
khiggins@energystrat.com
kfrancone@energystrat.com

WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 9th day of July, 2021.

Respectfully submitted,

By:

Phillip J. Russell

Prince Dussell

James Dodge Russell & Stephens P.C.

Attorneys for UAE

# Certificate of Service **Docket No. 21-057-14**

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served by email this day 9th day of July, 2021, on the following:

### DOMINION ENERGY UTAH

Jenniffer Nelson Clark jenniffer.clark@dominionenergy.com

Cameron Sabin cameron.sabin@stoel.com

### **DIVISION OF PUBLIC UTILITIES**

Chris Parker chrisparker@utah.gov William Powell wpowell@utah.gov Patricia Schmid pschmid@agutah.gov Justin Jetter jjetter@agutah.gov

### OFFICE OF CONSUMER SERVICES

Michele Beck mbeck@utah.gov Robert Moore moore@agutah.gov

/s/ Phillip J. Russell