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*Attorney for Western Resource Advocates*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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IN THE MATTER OF DOMINION ENERGY  
UTAH’S INTEGRATED RESOURCE PLAN  
(IRP) FOR PLAN YEAR: JUNE 1, 2023 TO  
MAY 31, 2024

Docket No. 23-057-02  
  
PETITION FOR LEAVE TO  
INTERVENE OF WESTERN  
RESOURCE ADVOCATES

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Pursuant to Utah Code Ann. § 63G-4-207, Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a regional non-profit organization that addresses climate change and its impacts to sustain the environment, economy, and people of the West. We work where decisions are made – at state legislatures, within state agencies and commissions, and by working directly with utilities, local governments, and municipalities – in seven Western states, including Utah. Our policy experts, economists, and attorneys use ingenuity and practicality, backed by science, to drive change for a more sustainable, equitable, and healthy future. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are ratepayers with Dominion Energy Utah (DEU). WRA has participated in public utility

proceedings for over 30 years and has been granted intervenor status in many Utah Commission dockets.

2. WRA's legal rights and interests may be substantially affected by this proceeding.

3. WRA has not determined specific positions it will take or the relief it will seek.

WRA seeks to intervene for purposes of attending technical conferences and protecting WRA's interests as they arise. Pursuant to the Commission's January 12, 2023, *Scheduling Order and Notice of Technical Conferences*, WRA contacted DEU to discuss signing a non-disclosure agreement to enable WRA's participation in technical conferences and information exchange while preserving the confidentiality of sensitive information. Along with this Petition, WRA is filing Confidential Information Certificates under Utah Rule R746-1-603.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing WRA to intervene.

5. WRA requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Sophie Hayes and Karl Boothman  
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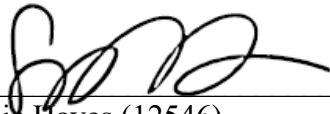
Nancy Kelly  
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WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Dated this 24<sup>th</sup> day of February 2023.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in black ink, appearing to read 'SHAYES', written over a horizontal line.

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CERTIFICATE OF SERVICE

Docket No. 23-057-02

I hereby certify that a true and correct copy of the foregoing was served by email this 24<sup>th</sup> day of February 2023 on the following:

**Dominion Energy Utah**

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