#### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Application of Enbridge Gas Utah to	)
Increase Distribution Rates and Charges	)
and Make Tariff Modifications	) Docket No. 25-057-06
	)
	)
	)

#### PETITION FOR LEAVE TO INTERVENE OF FEDERAL EXECUTIVE AGENCIES

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, the Federal Executive Agencies ("FEA"), through its undersigned counsel, files its Petition For Leave To Intervene in the above-captioned docket. In doing so, FEA states the following:

- 1. FEA represents numerous federal customers within the area serviced by Rocky Mountain Power ("the Company"). These entities include, but are not limited to, military installations, post offices, and federal buildings. For example, Hill Air Force Base ("Hill AFB") represents a significant customer to the Company. FEA expects its bills at locations such as Hill AFB to be substantially impacted by the final decision in this case.
- 2. FEA has a substantial legal interest in this case and will be affected by the Commission's decision on the Company's application. No other party is likely to adequately represent FEA's interests in this proceeding.
- 3. FEA has not fully determined the specific positions it will take or the relief it will seek. FEA seeks to intervene for the purpose of protecting its interests in this proceeding.

- 4. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by FEA's intervention, and FEA will comply with the scheduling order issued in this docket.
- 5. FEA requests copies of all correspondence, pleadings, documents, and orders be served on the following:

Maj Leslie R. Newton Capt Matthew R. Vondrasek Capt Michael A. Rivera Ebony M. Payton Mr. Thomas A. Jernigan TSgt James B. Ely AF/JAOE-ULFSC 139 Barnes Dr., Suite 1 Tyndall AFB, FL 32403 (850) 283-6347 Email: lesle.newton.1@us.af.mil matthew.vondrasek.1@us.af.mil michael.rivera.51@us.af.mil ebony.payton.ctr@us.af.mil thomas.jernigan.3@us.af.mil james.ely@us.af.mil ULFSC.Tyndall@us.af.mil

6. Pursuant to Rule R746-1-107(1)(a)(ii), FEA includes the certificates of good standing for the following attorneys licensed to practice in a foreign state:

Leslie R. Newton Michael A. Rivera Matthew R. Vondrasek Mr. Thomas A. Jernigan

- 7. In order to allow the FEA appropriate time to seek discovery and develop its testimony in this proceeding, the FEA conferred with parties to this proceeding in an attempt expedite the Commission's consideration of the FEA's intervention.
- 8. Accordingly, on 22 July 2025, the FEA's undersigned counsel conferred with representatives of all parties to this proceeding to respond by 24 July 2025. OCS, DPU, Nucor

Steel-Utah, the American Natural Gas Council, and Enbridge did not oppose the intervention. The remainder of the parties did not respond by the filing of this motion which is on 24 July 2025.

WHEREFORE, FEA respectfully requests permission to intervene as a full party in this docket.

DATED this 24th day of July 2025.

/s/ Michael A. Rivera

Michael A. Rivera, Capt, USAF Leslie R. Newton, Maj, USAF Matthew R. Vondrasek, Capt, USAF Mr. Thomas A. Jernigan James B. Ely, TSgt, USAF **Ebony Payton** AF/JAOE-ULFSC 139 Barnes Dr., Suite 1 Tyndall AFB, FL 32403 (850) 283-6347 Leslie.Newton.1@us.af.mil matthew.vondrasek.1@us.af.mil Michael.Rivera.31@us.af.mil Thomas.Jernigan.3@us.af.mil James.Ely@us.af.mil ebony.payton.ctr@us.af.mil Attorneys for Federal Executive Agencies

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition for Leave to Intervene of the Federal Executive Agencies, was served this 24th day of July, 2025, to the following:

#### Via Email:

Jenniffer Nelson Clark (jenniffer.clark@dominionenergy.com) Cameron Sabin (csabin@mayerbrown.com) Attorneys for Enbridge Gas Utah

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Federal Executive Agencies

JAMES B. ELY, MSgr, USAF FEA Paralegal

# Petition for Leave to Intervene of the Federal Executive Agencies

# Attachment A – Certificates of Good Standing



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Joshua E. Doyle Executive Director 850/561-5600 www.FLORIDABAR.org

State of Florida )

County of Leon ) In Re: 0102775

Leslie Rae Newton United States Air Force 3826 Whitehead Blvd

Panama City, FL 32404-4101

#### I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on **April 26, 2013**.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 25th day of June, 2025.

Cyrithia B. Jachson

Cynthia B. Jackson, CFO Administration Division

The Florida Bar

PG:R10 CTM-352992 ORIDA FINANCIA 1950



### Supreme Court State of Georgia NATHAN DEAL JUDICIAL CENTER Atlanta 30334

June 26, 2025

I hereby certify that Michael Anthony Rivera, Esq., was admitted on the 5<sup>th</sup>day of March, 2012, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date he has been and is now a member of this bar in good standing, as appears from the records and files in this office.



Witness my signature and the seal of this Court hereto affixed the day and year first above written.

. Clerk



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

## Matthew Robert Vondrasek

was duly qualified and admitted on December 12, 2022 as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, an Active member in good standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of

Washington, D.C., on June 25, 2025.

JULIO A. CASTILLO Clerk of the Court

Issued By:

David Chu - Director, Membership District of Columbia Bar Membership



#### CERTIFICATE OF GOOD STANDING

I, MICHEL JENDRETZKY, Director of the Office of Attorney Admissions and Compliance of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Attorney Services Section of the Supreme Court and that the Office of Attorney Admissions and Compliance is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

#### Thomas Andrew Jernigan Attorney Registration No. 0084008

was admitted to the practice of law in Ohio on November 17, 2008; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.



IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 9th day of July, 2025.

MICHEL JENDRETZKY

Director, Office of Attorney Admissions and Compliance

Shannon Scheid

Administrative Assistant, Attorney Services Section

Shannon B. Scheid

No. 2025-07-09-1

Verify by email at <u>GoodStandingRequests@sc.ohio.gov</u>