F. ROBERT REEDER (2710) WILLIAM J. EVANS (5276) PARSONS BEHLE & LATIMER 201 South Main Street Suite 1800 Salt Lake City, Utah 84111

Telephone: (801) 532-1234 Facsimile: (801) 536-6111

#### **BEFORE THE**

### PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PACIFICORP for Approval of Its Proposed Electric Rate Service Schedules & Electric Service Regulations

DOCKET NO. 01-035-01

### PETITION OF THE UTAH INDUSTRIAL ENERGY CONSUMERS TO INTERVENE

In accordance with Rule 756-100-6 of the Public Service Commission's Rules of Practice and Procedure and the Provisions at Utah Code Ann. § 63-46b-9, Abbott Critical Care, Fairchild Semiconductor, Amoco Petroleum Products/Salt Lake, Holnam, Inc., Kimberly-Clark Corporation, Micron Technology, Inc., Praxair, Inc., Western Zirconium, and Kennecott Utah Copper Corporation, (hereinafter and throughout the course of this proceeding referred to as "Utah Industrial Energy Consumers" or "UIEC"), hereby move the Public Service Commission ("Commission") for leave to intervene in the above-referenced proceeding.

In support of this Petition to Intervene, the UIEC state as follows:

1. PacifiCorp, dba Utah Power & Light ("PacifiCorp") has filed an Application with the Commission for approval of an increase in its rates and changes. It has also filed an

Emergency Motion for an Interim Rate Increase.

2. The UIEC are a group of customers who take service from PacifiCorp under Rate

Schedule 9 or under Special Contracts.

3. The UIEC have a direct, immediate and substantial interest in this proceeding as

customers of PacifiCorp because the availability of electrical power, the rate they pay for electric

service, and their willingness and/or ability to continue service arrangements with PacifiCorp

may be affected by a decision of the Commission on PacifiCorp's Application.

4. The interest of the UIEC will not be adequately represented by any other party to

this proceeding.

5. If the UIEC is granted intervention, they hereby request that service of all

pleadings, notices, etc. be made to the following:

F. Robert Reeder

William J. Evans

Parsons Behle & Latimer

201 South Main Street, Suite 1800

Salt Lake City, Utah 84111

BobReeder@pblutah.com

WEvans@pblutah.com

6. The interest of justice and the orderly and prompt conduct of this proceeding will

not be impaired by the UIEC's intervention.

7. The UIEC have not yet determined the level of their participation or the precise

nature of the relief that they will seek, but request that the Commission grant them intervention

as their interests may appear.

WHEREFORE, the UIEC requests that the Commission enter an Order permitting the UIEC to intervene in this docket and to participate to the full extent allowed by the law and the Commission's Rules.

DATED this \_\_\_\_\_ day of January, 2001.

F. ROBERT REEDER WILLIAM J. EVANS

# **CERTIFICATE OF SERVICE**

I hereby certify that on this \_\_\_\_ day of January, 2001, I caused to be served by facsimile and to be mailed, first class, postage prepaid, a true and correct copy of the foregoing **PETITION** 

## OF THE UTAH INDUSTRIAL ENERGY CONSUMERS TO INTERVENE, to:

Brent Hatch Edward A. Hunter Gary Dodge Jon Eriksson Hatch James & Dodge Stoel Rives LLP 10 West Broadway, Suite 400 201 South Main Street Salt Lake City, UT 84101 Suite 1100

Facsimile: 363-6666 Salt Lake City, Utah 84111

Doug Tingey Michael Ginsberg Assistant Attorney General Assistant Attorney General 500 Heber M. Wells Building 500 Heber M. Wells Building 160 East 300 South 160 East 300 South

Salt Lake City, UT 84111 Salt Lake City, Utah 84111

Facsimile: 366-0352 Facsimile: 366-0352