UTAH RATEPAYERS ALLIANCE

Salt Lake Community Action Program Crossroads Urban Center Utah Legislative Watch

764 South 200 West Salt Lake City, Utah 84101

June 20, 2003

Julie Orchard, Commission Secretary Public Service Commission 160 East 300 South, 4th Floor Salt Lake City, Utah 84101

Re: Docket No. 02-035-T12

Dear Ms. Orchard:

Enclosed is the Petition for Leave to Intervene of Salt Lake Community Action Program, Crossroads Urban Center and Utah Legislative Watch (collectively referred to as the Utah Ratepayers Alliance) in the above-referenced docket. Also enclosed is the List of Issues to be submitted today as per the Commission's June 18, 2003 Revised Scheduling Order in this docket. Please file as is your usual practice.

Thank you for your attention in this matter.

Sincerely,

Betsy Wolf

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH ***

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In the Matter of Demand Side Management Cost Recovery by PACIFICORP dba UTAH POWER & LIGHT COMPANY

Docket No. 02-035-T12

PETITION FOR LEAVE TO INTERVENE

Pursuant to the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), Salt Lake Community Action Program, Crossroads Urban Center and Utah Legislative Watch (collectively known as the Utah Ratepayers Alliance) hereby petition for leave to intervene in the above-captioned docket and, in support thereof, state as follows:

1. The Salt Lake Community Action Program (CAP) is a private nonprofit communitybased organization that addresses the needs of low-income people through service delivery and advocacy.

2. Crossroads Urban Center (Crossroads) is a nonprofit community-based organization serving the needs of low-income people in the Salt Lake Metropolitan Area.

3. Utah Legislative Watch (ULW) is a nonprofit volunteer corporation established to address the interests of citizens of Utah as consumers and as taxpayers.

4. CAP, Crossroads and ULW have a special interest in ensuring that the people they represent are charged fair and reasonable electric rates. Any change in rates of PacifiCorp may have an impact on residential electric customers and the price that residential electric customers will have to pay.

5. Furthermore, since Salt Lake Community Action Program and Crossroads Urban Center represent low income people, those organizations have a particular interest in ensuring that electric utility rates remain as low as possible since people with limited incomes pay such a disproportionate share of their income for electric service.

6. Accordingly, CAP, Crossroads and ULW possess a direct and substantial interest in the subject matter of this case, and seek via this intervention petition to protect that interest as it may appear. Participation in this docket will be in the public interest and may also be of particular assistance to the Commission in rendering informed decisions on the issues that will likely be raised.

7. Intervention by CAP, Crossroads and ULW will not delay the proceeding or unduly burden the other parties in the proceeding.

8. CAP, Crossroads and ULW request that all pleadings, correspondence, discovery, and other documents be served on:

Betsy Wolf 764 South 200 West Salt Lake City, Utah 84101 FAX: (801) 355-1798 VOICE: (801) 582-2149 E-mail <u>bwolf@slcap.org</u>

9. When sending information regarding this docket electronically, please electronically mail to the following people as well:

Jeff Fox:jeffvfox@attbi.comClaire Geddes:geddes@xmission.comBruce Plenk:bplenk@igc.org

Respectfully submitted this _____ day of June, 2003.

Betsy Wolf, Utility Ratepayer Advocate Salt Lake Community Action Program

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition for Intervention and List of Issues, both in Docket No. 02-035-T12, of Salt Lake Community Action Program, Crossroads Urban Center and Utah Legislative Watch (collectively known as the Utah Ratepayers Alliance) were mailed, postage prepaid, this _____ day of June, 2003, to the following:

Edward Hunter John Eriksson STOEL RIVES 201 South Main Street, Suite 1100 Salt Lake City, UT 84111

Patricia Schmid Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111

Reed Warnick Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84111

Rich Collins Westminster College 1840 South 1300 East Salt Lake City, UT 84105

Howard Geller SWEEP 2260 Baseline Road, Suite 212 Boulder, CO 80302

Respectfully,

Marco Kunz Salt Lake City Attorney's Office 451 South State Street, Suite 505A Salt Lake City, UT 84111

Gary A. Dodge Hatch, James & Dodge 10 West Broadway, Suite 400 Salt Lake City, UT 84101

Eric Guidry LAW Fund of the Rockies 2260 Baseline Road, Suite 200 Boulder, CO 80302

Jeff Burks Utah Office of Energy 1594 West North Temple, Suite 3610 Salt Lake City, UT 84114-6480

Betsy Wolf