ARTHUR F. SANDACK (#2854)

Attorney for Petitioner

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Date Submitted: September 3, 2003

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF UTAH

)	
In the Matter of the Application of)	
PACIFICORP for Approval of its Proposed)	PETITION FOR
Electric Service Schedules and Electric)	INTERVENTION
Service Regulations)	BY IBEW LOCAL 57
)	
)	
)	
) Docket No. 03-2035-02
)	
)	

Comes now petitioner, by and through counsel, pursuant to §63-46b-9 UCA as amended and Commission's Rules of Practice R746-100-7, and hereby petitions the Commission to permit it to intervene in the above matter and represents as follows:

- 1. Petitioner, International Brotherhood of Electrical Workers, Local 57 is a labor organization representing approximately 1,634 employees of Applicant Pacificorp, in its Utah Power and Light Division. Most of these employees reside in Utah. The employees work in Applicant's power supply and delivery operations.
- 2. Employees' rights and interests may be substantially affected by this proceeding as it will affect the cost and ability of the Applicant to safely and competently maintain, deliver, develop, generate, and sell electrical service by the efforts of its labor force. Accordingly, it is in

the interests of this petitioner and the public that intervention be granted.

3. Petitioner has yet to determine what its position will be to the Application and

evidence to be submitted in support thereof. However, Petitioner should be permitted to

intervene as its interests may appear during the proceeding.

4 The interests of justice and the orderly and prompt conduct of these proceedings will

not be delayed, or materially impaired or prejudiced by permitting intervention.

5 Petitioner's interests are not adequately represented by any party to the proceeding.

6. Notices and pleading should be sent to:

ARTHUR F. SANDACK, Esq

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Electronic filings, notices and orders should be sent by email to asandack@itower.net

Facsimile copies 801-363-1715

WHEREFORE PETITIONER prays that the Commission permits it to intervene in the

above proceedings as its interests appear and grant it such relief as deemed justified by the

Dated this ____ day of ________, 2003.

Commission.

Arthur F. Sandack

MAILING CERTIFICATE

I hereby certify that a true and correct copy of the Petition For Intervention by IBEW Local 57 was mailed, first class, postage prepaid, on the _____ day of September, 2003 to:

Edward Hunter Gary A. Dodge

John Eriksson Hatch, James & Dodge

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