

Date submitted: June 24, 2005

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In The Matter of: HELP, Electric Lifeline Program Evaluation	Docket No. 04-035-21 Light and Truth's petition to revisit specific past issues
--	--

This docket is the "major review" following the annual reviews ordered by the Commission in Docket No. 00-035-T07. A great number of issues, ranging from small details to broad goals, will be revisited that were subjects of past Commission orders. Light and Truth believes this review should be comprehensive and be in sufficient depth to fully evaluate the HELP program, its basis, its operation, its effectiveness and particularly its success. Light and Truth specifically requests the Commission revisit the following issues for the reasons explained:

1. The Commission's jurisdiction and authority to implement the HELP program under the conditions that are now known to exist as opposed to those assumed to exist at the time of implementation.

Many claims, upon which the Commission based its implementation order, have been found to not be supportable. Comparison of HELP to other Commission ordered programs like telephone lifeline have been found to be faulty. These issues will be detailed in filed testimony by Light and Truth.

2. The claim that HELP funds may be collected in rates and that collection in rates does not violate Utah Code 54-4-37.

It has been demonstrated that the HELP program has nothing to do with Pacificorp's utility operation and function and, therefore, is outside regulation. It has also been demonstrated that Pacificorp's actions and circumstances exactly match those specified in Utah Code 54-4-37. These issues will be detailed in filed testimony by Light and Truth.

Respectfully submitted,

Paul Mecham, for
Light and Truth

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Light and Truth's petition to revisit specific past issues in the HELP Program Docket No. 04-035-21 was distributed and transmitted electronically on the 24th day of June, 2005 to the following:

Michael Ginsberg
Patricia Schmid
Assistant Attorneys General
500 Heber Wells Building
160 East 300 South
Salt Lake City, Utah 84111
mginsberg@utah.gov
pschmid@utah.gov

Reed Warnick
Paul Proctor
Assistant Attorneys General
500 Heber Wells Building
160 East 300 South
Salt Lake City, Utah 84111
rwarnick@utah.gov
pproctor@utah.gov

Edward A. Hunter, Jr.
Jennifer Martin
Stoel Rives LLP
201 South Main Street
Salt Lake City, Utah 84111-4904
eahunter@stoel.com
jhmartin@stoel.com

Glenn Bailey
Crossroads Urban Center
347 South 400 East
Salt Lake City, Utah 84111-2968
glenn@crossroads-u-c.org

Ronald J. Binz
Public Policy Consulting
333 Eudora Street
Denver Colorado 80220-5721
rbinz@rbinz.com

Gary Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
gdodge@hjdllaw.com

Thomas W. Forsgren
2868 Jennie Lane
Holladay, Utah 84117
twforsgren@msn.com

Dale F. Gardiner
Parry, Anderson & Gardiner
60 East South Temple, #1200
Salt Lake City, Utah 84111
dfgardiner@parrylaw.com

Dennis Miller - Legal Asistant
Division of Public Utilities
Heber M. Wells Building, 4th Floor
160 Est 300 South, Box 146751
Salt Lake City, Utah 84114-6751
dennismiller@utah.gov

Doug Larson
PacifiCorp
One Utah Center, Suite 2300
201 South Main Street
Salt Lake City, Utah 84140-2190
doug.larson@pacificorp.com

Michael Zimmerman
PacifiCorp
One Utah Center, Suite 2300
201 South Main Street
Salt Lake City, Utah 84140-2190
michael.zimmerman@pacificorp.com

Claire Geddes
Utah Legislative Watch
geddes@xmission.com

Jeff Larsen
PacifiCorp
One Utah Center, Suite 2300
201 South Main Street
Salt Lake City, Utah 84140-2190
jeff.larsen@pacificorp.com

John Stewart
PacifiCorp
One Utah Center, Suite 2300
201 South Main Street
Salt Lake City, Utah 84140-2190
john_w.stewart@pacificorp.com

Coralette M. Hannon
6705 Reedy Creek Rd.
Charlotte, NC 28215
channon@aarp.org

Laura Polacheck
AARP Utah
6975 S. Union Park Center, #320
Midvale, UT 84047
lpolacheck@aarp.org

Community and Culture Development
Attn: HELP program
Sherm Roquero
Michael Johnson
324 South State Street, Suite 500
Salt Lake City, Utah 84111
shermr@utah.gov
mrjohnson@utah.gov

Bruce Plenk
2958 N. St. Augustine Place
Tucson, AZ 85712
bplenk@igc.org

Utah Ratepayers Alliance
c/o Betsy Wolf
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
bwolf@slcap.org

Dated this 24th day of June, 2005

Paul Mecham
Light and Truth