Major Craig Paulson. AFLSA/ULT Utility Litigation Team 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319 (850) 283-6350 Date Submitted: August 24, 2004

## **BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Petition of PacifiCorp)	Docket No. 04-035-42
)	
)	MOTION FOR LEAVE TO
)	INTERVENE
)	
)	

Now comes the Federal Executive Agencies ("FEA"), by and through its counsel, Major Craig Paulson, and pursuant to Utah Admin. R. R746-100-7 (2000) and Utah Code Ann. § 63-46b-9, respectfully requests that the Commission grant this Motion for Leave to Intervene.

In support thereof FEA states:

1. That under Docket No.04-035-42, PacifiCorp ("PacifiCorp" or "Company"), has applied to the Utah Public Service Commission for a rate increase estimated at \$111 million.

2. That FEA operates several facilities within Utah, including Hill Air Force Base,

Tooele Army Depot, Dugway Proving Grounds, and Deseret Chemical Depot. The FEA receive service at these facilites from PacifiCorp.

3. That the rates paid by FEA for electric service are likely to be affected by the outcome of this proceeding.

4. That FEA has a direct interest in the outcome of this proceeding. At this point in the process, FEA has not yet formulated what positions, if any, it will take regarding this filing.

5. Any other party cannot adequately represent thet FEA's interests, due to the unique

status of the Federal government.

6. That FEA has a substantial interest in this proceeding and its inclusion would

promote the interests of justice.

Wherefore, FEA prays that the Commission grant it the following relief:

A. That it be granted Leave to Intervene in and become a party to this proceeding;

B. That the following be added to the service list in this proceeding:

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Mr. James Howarth OO-ALC/JAN 6026 Cedar Lane, Bldg 1278 Hill AFB, UT 84056 James.howarth@hill.af.mil

C. That the Commission grant such other relief as it deems appropriate.

Respectfully submitted,

FEDERAL EXECUTIVE AGENCIES

Craig Paulson

Major Craig Paulson Utility Litigation Team General Litigation Division 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319 (850) 283-6350

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of August, 2004, I caused to be served, via U.S. mail, a true and correct copy of the Motion for Leave to Intervene to the following:

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