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Attorney for Salt Lake City Corporation and Million Solar Roofs Partnership

### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

\_\_\_\_\_

In the Matter of the Application of PacifiCorp for Approval of its Proposed Electric Service Schedules and Electric Service Regulations ) DOCKET NO. 04-035-42 ) PETITION TO INTERVENE OF

) SALT LAKE CITY AND MILLION ) SOLAR ROOFS PARTNERSHIP

\_\_\_\_\_

In accordance with Rule R746-100-7 of the Commission's Rules of Practice and Utah Code § 63-46b-9, Salt Lake City and the Million Solar Roofs Partnership (MSR), petitions the Utah Public Service Commission for permission to intervene in this docket, and state:

### I. NOTICES

The name, address, and telephone number of the persons to whom communications to MSR should be sent are:

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Sarah Wright Million Solar Roofs Partnership 917 Second Ave. Salt Lake City, UT 84103 Telephone 673-7156 E-Mail:swrightutah@earthlink.net

# II. IDENTITY OF PETITIONERS

Salt Lake City is the capital city of Utah and has intervened in numerous Commission proceedings as its interests have dictated. Salt Lake City and its consultants have entered into a partnership (MSR) with the Department of Energy and others to promote photovoltaic rooftop panels. The goal is to lower financial and regulatory barriers for this renewable resource.

# III. INTEREST OF PETITIONERS

Salt Lake City, as a direct consumer of electricity from Utah Power and as a representative of its citizens, has a direct interest in the development of cost effect resources and the prudent cost recovery of such resources. Salt Lake City and MSR believe that the use of a future test year may help in the development of peak shaving measures such as solar energy that will reduce the overall cost of providing electric service to Utah Power's customers.

#### IV. NATURE OF INTERVENTION

The evidence to be presented by Salt Lake City and the MSR, if any, will be of material value to the Commission in its determination of the issues involved in this proceeding, and SLC and MSR's intervention will not broaden those issues or delay the proceedings.

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Accordingly, SLC and MSR request permission to intervene as parties to this proceeding and to participate to the full extent permitted under the Commission's rules and Utah Law.

Submitted November 22, 2004.

By:\_\_\_\_\_

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# **CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing PETITION TO INTERVENE to the below listed by electronic mail, this  $22^{nd}$  day of November, 2004.

lmathie@utah.gov

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