DEPARTMENT OF THE AIR FORCE AIR FORCE LEGAL SERVICES AGENCY/UTILITY LITIGATION TEAM TYNDALL AIR FORCE BASE, FLORIDA

Capt Damund E. Williams AFCESA/ULT 139 Barnes Drive Suite 1 Tyndall AFB FL 32403-5319

January 30, 2006

Ms. Julie Orchard Public Service Commission of Utah Heber M. Wells Building, Fourth Floor 160 East 300 South Salt Lake City Utah 84111

Dear Ms. Orchard,

The Federal Executive Agencies, by and through the undersigned counsel of the Air Force Utility Litigation Team, encloses herewith an original and three copies of its Motion to Intervene in Docket 05-035-102.

Please give me a call at 850-283-6350 or e-mail me at <u>damund.williams@tyndall.af.mil</u> if you need additional information or need to discuss this matter.

Sincerely,

s/Damund E. Williams DAMUND E. WILLIAMS, Capt, USAF Utility Litigation and Negotiation Attorney for the Federal Executive Agencies AL Atty #ASB-9660-W54D Lt Col Karen White Capt Damund E. Williams AFLSA/ULT Utility Litigation Team 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319 (850) 283-6217 Date Submitted: January 30, 2006

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of PacifiCorp)	Docket No. 05-035-102
)	
)	
)	MOTION FOR LEAVE TO
)	INTERVENE
)	

Now comes the Federal Executive Agencies ("FEA"), by and through its counsel, Lt Col Karen White and Capt Damund Williams, 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.05-035-135, PacifiCorp ("PacifiCorp" or "Company"), has applied to the Utah Public Service Commission for a proposed power cost adjustment mechanism on November 23, 2005.

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 receives service at these facilities 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 the 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:

Lt Col Karen White AFLSA/ULT Utility Litigation Team 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403 <u>Karen.White@tyndall.af.mil</u> (850) 283-6217 (850) 283-6219 (fax)

Capt Damund E. Williams AFLAS/ULT 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32404 Damund.Williams@tyndall.af.mil (850) 283-6350 (850) 283-6219 (fax) 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

Capt Damund E. Williams Utility Litigation Team 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of January, 2006, I caused to be served, via U.S. mail or email, a true and correct copy of the Motion for Leave to Intervene to the following:

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