MARCO B. KUNZ, #4864

451 South State Street, Suite 505A

Salt Lake City, Utah 84111 Telephone: (801) 535-7788

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. 06-035-21

PETITION TO INTERVENE OF THE MILLION SOLAR ROOF PARTNERSHIP

Pursuant to Utah Code Ann. § 63-46b-9 (1992) and Utah Admin. Code § R746-100-7, Million Solar Roof Partnership, (MSRP) hereby move for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah.

In support of this Petition to Intervene, the MSRP states as follows:

- 1. On March 7, 2006, PacifiCorp (d.b.a. Utah Power & Light Company) ("PacifiCorp") filed an Application with the Commission for approval of its proposed Electric Service Schedules and Electric Service Regulations.
- 2. Million Solar Roof Partnership is a coalition seeking to reduce the financial barriers associated with the adoption of photovoltaic generation of electrical energy. The Coalition consists of Salt Lake City Corporation, the U.S. Department of Energy, Sarah Wright of Utah Clean Energy and Richard Collins of Westminster College.

3. The MSRP requests intervention in this docket to have their interests represented and such interests will not be adequately represented by any other party to this proceeding.

4. The nature of our intervention will be primarily to support the approval of funds requested by the Company to support its proposed pilot program for a photovoltaic solar roof buy-down program. There may be other interests of MSRP that could arise during the course of the proceeding and we reserve the right to advocate for those interests.

5. If the coalition herein referred to as MSRP is granted leave to intervene in this proceeding, it hereby requests that service of all pleadings, notices, etc. be made to the following:

Richard Collins
Westminster College
Gore School of Business
18 40 South 1300 East
Salt Lake City, UT 84114
rcollins@westminstercollege.edu

Sarah Wright
Utah Clean Energy
1014 Second Avenue
Salt Lake City, UT 84103
sarah@utahcleanenergy.org

Marco Kunz, Esq. Salt Lake City Corporation 451 South State Street Salt Lake City, Utah 84111 marco.kunz@slcgov.com

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the MSRP's Petition to Intervene.

WHEREFORE, the MSRP requests that the Commission enter an Order granting its request to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 20th day of April, 2006.

/s/

MARCO KUNZ Attorney for MSRP

834365.1

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of April, 2006, I caused to be mailed, first class, postage prepaid and/or e-mailed, a true and correct copy of the foregoing **PETITION TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS**, to:

Edward A. Hunter
Jennifer Horan
STOEL RIVES LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111-4904
jehoran@stoel.com
eahunter@stoel.com

Reed Warnick Assistant Attorney General 101 East 300 South, Fifth Floor Salt Lake City, Utah 84111 rwarnick@utah.gov

Michael Ginsberg Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, Utah 84111 mginsberg@utah.gov Paul Proctor Assistant Attorney General 101 East 300 South, Fifth Floor Salt Lake City, UT 84111 pproctor@utah.gov

Data Request Response Center PacifiCorp 825 NE Multnomah, Suite 800 Portland, OR 97232 datarequest@pacificorp.com Arthur F. Sandack Attorney for IBEW Local 57 8 East Broadway, Suite 510 Salt Lake City, UT 84111 asandack@msn.com

Roger J. Ball 1375 Vintry Lane Salt Lake City, UT 84121 Ball.roger@gmail.com Roger Swenson
Energy Consultant for US Magnesium
LLC
238 North 2200 West
Salt Lake City, UT 84116
Roger.swenson@prodigy.net

Lt. Col. Karen White
Capt. Damund E. Williams
AFLSA/ULT
Utility Litigation Team
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5319
Karen.white@tyndall.af.mil
Damund.williams@tyndall.af.mil

Thomas E. Bingham Utah Manufacturers Association 136 East South Temple, Suite 1740 Salt Lake City, UT 84111 tom@umaweb.org C. Scott Brown
Colleen Larkin Bell
Questar Gas Company
180 East 100 South
PO Box 45360
Salt Lake City, UT 84145-03609
Scott.brown@questar.com
Colleen.bell@questar.com

Ronald J. Day, CPA
Central Valley Water Reclamation
Facility
800 West Central Valley Road
Salt Lake City, UT 84119
dayr@cvwrf.org

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com

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

Peter J. Mattheis Eric J. Lacey Brickfield, Burchette, Ritts & Stone, PC 1025 Thomas Jefferson Street, N.W. 800 West Tower Washington, DC 20007 pjm@bbrslaw.com

Gerald H. Kinghorn Jeremy R. Cook Parsons Kinghorn Harris, PC 111 East Broadway, 11<sup>th</sup> Floor Salt Lake City, UT 84111 ghk@pkhlawyers.com jrc@pkhlawyers.com

Gary A. Dodge Hatch, James & Dodge 10 West Broadway, Suite 400 Salt Lake City, UT 84101 gdodge@hjdlaw.com Rick Anderson Kevin Higgins Energy Strategies 39 Market Street, Suite 200 Salt Lake City, UT 84101 randerson@energystrat.com khiggins@energystrat.com

Dennis Miller Division of Public Utilities Heber M. Wells Bldg., 4<sup>th</sup> Floor 160 East 300 South – Box 146751 Salt Lake City, UT 84114-6751 dennismiller@utah.gov

\_/s/\_\_\_\_Charleen Smith
Legal Assistant

834365.1