

Michael R. Christensen
Project Manager
JT Wasatch Commons, LC
1165 E. Wilmington Ave, Suite 275
Salt Lake City, Utah 84106
Phone: (801) 487-6670
Fax: (801) 487-6671
Email: mikec@jtcompany.com

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Complaint of Rocky Mountain Power, a Division of PacifiCorp, Against Heber Light & Power Regarding Unauthorized Service by Heber Light & Power in Areas Certificated to Rocky Mountain Power	DOCKET NO. 07-035-22 PETITION TO INTERVENE OF JT WASATCH COMMONS, LC
---	--

JT Wasatch Commons, LC (JTWC), pursuant to Utah Code Annotated § 63-46b-9 and Utah Administrative Code R746-100-7, petitions the Commission to grant it intervention in this docket. The grounds for this petition are as follows:

1. JTWC has rights and interests that may be substantially affected by this proceeding. JTWC is a Limited Liability Company that is engaged in the real estate development business. JTWC has a pending development in Wasatch County known as Wasatch Commons and has an interest in the issue of whether electric service to its development will be provided by Rocky Mountain Power or Heber Light & Power Company.

2. JTWC has not yet fully determined the position it will take in this proceeding. After reviewing the testimony to be filed by Rocky Mountain Power and Heber Light & Power Company, JTWC will be better able to determine its position.

3. Granting JTWC intervention will not interfere with the interests of justice and the

orderly and prompt conduct of this proceeding. The Scheduling Order issued by the Commission in this matter on November 3, 2008, set December 18, 2008 as the deadline for interested parties to petition for intervention. This petition is filed by that deadline.

For the foregoing reasons, JTWC respectfully requests that the Commission enter an order granting it intervention in this proceeding.

DATED: December 16, 2008.

Michael R. Christensen
Project Manager
JT Wasatch Commons, LC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PETITION TO INTERVENE OF JT WASATCH COMMONS, LC was served upon the following at the email addresses indicated below on December 16, 2008:

Mark C. Moench
R. Jeff Richards
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
Mark.Moench@pacificorp.com
Jeff.Richards@pacificorp.com

Joseph T. Dunbeck
Joseph A. Skinner
Dunbeck & Gordon
175 N. Main Street, Suite 102
Heber City, UT 84032
jtd@dunbeckgordonlaw.com
jas@dunbeckgordonlaw.com

Michael Ginsberg
Patricia E. Schmid
Assistant Attorney Generals
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov

Thomas Low
Wasatch County Attorney
805 West 100 South
Heber City, UT 84032
tlow@co.wasatch.ut.us

Gregory B. Monson
Ted D. Smith
Stoel Rives LLP
201 South Main Street, Suite 1100
Salt Lake City, UT 84111
gbmonson@stoel.com
tsmith@stoel.com

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

Paul H. Proctor
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov