ARTHUR F. SANDACK (#2854) Attorney for Petitioner IBEW Local 57 8 East Broadway, Ste 510 Salt Lake City, Utah 84111 Telephone: (801) 532-7858

asandack@msn.com

Date Submitted: January 4, 2008

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge

Docket No. 07-035-93

PETITION TO INTERVENE OF IBEW LOCAL 57

Comes now Petitioner, by and through counsel, pursuant to §63-46b-9 UCA as amended and Commission's Rules of Practice R746-100-7, and hereby petitions the Commission to permit it to intervene in the above matter and represents as follows:

organization representing approximately 1,800 employees of Applicant Rocky Mountain Power.

Most of these employees reside in Utah. The employees work in Applicant's power supply and

1. Petitioner, International Brotherhood of Electrical Workers, Local 57 is a labor

delivery operations and are covered by the terms of collective bargaining agreements between

Petitioner and Applicant.

2. Petitioner and its represented employees' rights and interests may be substantially affected

by this proceeding as it will affect the management, cost and ability of the Utility to safely and

competently maintain and deliver electrical service by the efforts of its labor force. Accordingly, it

is in the interests of this petitioner and the public that intervention be granted.

3. Petitioner has yet to determine what its position will be to the Application and evidence

to be submitted in support thereof. However, Petitioner should be permitted to intervene as its

interests may appear during the proceeding.

4. The interests of justice and the orderly and prompt conduct of these proceedings will not

be delayed, or materially impaired or prejudiced by permitting intervention.

5. Petitioner's interests are not adequately represented by any party to the proceeding.

6. Notices and pleading should be sent to:

ARTHUR F. SANDACK, Esq.

8 East Broadway, Ste 510

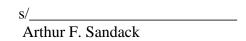
Salt Lake City, Utah 84111

Electronic filings, notices and orders should be sent by email to asandack@msn.com

Facsimile copies 801-363-1715

proceedings as its interests appear and grant it such relief as deemed justified by the Commission.

Dated this 4th day of January, 2008.



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 3^{rd} day of January, 2008, to the following:

Justin Lee Brown
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
Telephone No. (801) 220-4050
Facsimile No. (801) 220-3299
justin.brown@pacificorp.com

Daniel Solander, Rocky Mountain Power 201 South Main Street, Suite 2300 Salt Lake City, Utah 84111 Telephone No. (801) 220-4014 Facsimile No. (801) 220-3299 daniel.solander@pacificorp.com

Attorneys for Rocky Mountain Power

Michael Ginsberg
Patricia Schmid
ASSISTANT ATTORNEY GENERAL
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov
Attorneys for Division of Public Utilities

Gary A. Dodge HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 Telephone: 801.363.6363 Facsimile: 801.363.6666 Email: gdodge@hjdlaw.com

Kevin Higgins Neal Townsend ENERGY STRATEGIES 39 Market Street, Suite 200 Salt Lake City, UT 84101 Telephone: 801.355.4365 Facsimile: 801.521.9142

E-mail: khiggins@energystrat.com

ntownsend@energystrat.com Attorneys for UEA Intervention Group

Paul Proctor
Reed Warnick
ASSISTANT ATTORNEY GENERAL
160 East 300 South, 5th Floor
Salt Lake City, UT 84111
rwarnick@utah.gov
pproctor@utah.gov
Attorneys for Committee of Consumer Services

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
PARSONS BEHLE & LATIMER
One Utah Center, Suite 1800
201 S Main St.
Salt Lake City, UT 84111
BobReeder@pblutah.com
BEvans@pblutah.com
VBaldwin@pblutah.com
Attorneys for UIEC

Roger J. Ball 1375 Vintry Lane Salt Lake City, Utah 84121 ball.roger@gmail.com

Roger Swenson US Magnesium LLC 238 North 2200 West

| Salt Lake City, U | Itah 8 | 4116 |
|-------------------|--------|-------|
| roger.swenson@ | prodig | y.net |

/s/ _____