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Date submitted June 2, 2009

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Costs Adjustment Mechanism.	Docket No. 09-035-15 PETITION TO INTERVENE OF IBEW LOCAL 57
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Pursuant to Utah Code Ann. § 63-46b-9 and Rule R746-100-7, the International Brotherhood of Electrical Workers, Local 57, hereby petitions the Commission to permit it to intervene in the above matter. In support of this petition, Petitioner represents as follows:

1. Petitioner, International Brotherhood of Electrical Workers, Local 57 is a labor organization representing approximately 1,800 employees of Applicant Rocky Mountain Power and PacifiCorp Energy. Most of these employees reside in Utah. The employees work in Applicant's power supply and delivery operations and are covered by the terms of collective bargaining agreements between Petitioner and Applicant and Applicant's generation power supply entity, PacifiCorp Energy.

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 through 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
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See below

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

Facsimile transmissions can be manually received at 801-595-1300 but this requires advance notice and an arrangement for the time for doing so.

WHEREFORE PETITIONER prays that the Commission permit it to intervene in the above proceedings as its interests appear and grant it such relief as deemed justified by the Commission.

Dated this 2nd day of June, 2009.

s/_____
Arthur F. Sandack

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 2nd day of June, 2009, to the following:

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