

F. ROBERT REEDER (2710)
VICKI M. BALDWIN (8532)
PARSONS BEHLE & LATIMER
One Utah Center
201 South Main Street, Suite 1800
Post Office Box 45898
Salt Lake City, UT 84145-0898
Telephone: (801) 532-1234
Facsimile: (801) 536-6111
Attorneys for UIEC, an Intervention Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of an Electric Service Agreement between Rocky Mountain Power and Kennecott Utah Copper LLC.

Docket No. 09-035-59

**PETITION TO INTERVENE OF
KENNECOTT UTAH COPPER, LLC**

In accordance with Rule 746-100-7 of the Public Service Commission's Rules of Practice and Procedure and the Provisions of Utah Code Ann. § 63-46b-9, Kennecott Utah Copper, LLC ("Kennecott") hereby petitions the Public Service Commission ("Commission") for leave to intervene in the above-referenced proceeding.

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

1. Kennecott takes electrical service from PacifiCorp (d.b.a. Rocky Mountain Power) ("Rocky Mountain" or the "Company").
2. On August 11, 2009, the Company filed its Application for Approval of an Electric Service Agreement ("ESA") with Kennecott.
3. On August 19, 2009, the Commission issued notice that a hearing in the above-entitled matter will be conducted on Wednesday, November 4, 2009, at 9:30 a.m.
4. On August 20, 2009, a Protective Order was issued by the Commission.

5. Kennecott has a direct, immediate, and substantial interest in this proceeding as a customer of Rocky Mountain and party to the ESA. Kennecott's rates for electric service will be affected by a Commission decision on Rocky Mountain's Application.

6. The interests of Kennecott will not be adequately represented by any other party to this proceeding.

7. If granted leave to intervene in this proceeding, Kennecott hereby requests that service of all pleadings, notices, etc. be made to the following:

F. Robert Reeder
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
bobreeder@parsonsbehle.com

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

9. Kennecott seeks approval of the ESA between it and Rocky Mountain that is the subject of this matter, and requests that the Commission grant Kennecott intervention as its interests may further appear.

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

DATED this 27th day of August, 2009.

/s/ Vicki M. Baldwin

F. ROBERT REEDER
VICKI M. BALDWIN
PARSONS BEHLE & LATIMER
Attorneys for Kennecott Utah Copper, LLC

CERTIFICATE OF SERVICE

(Docket No. 09-035-59)

I hereby certify that on this 27th day of August 2009, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION TO INTERVENE OF KENNECOTT UTAH COPPER, LLC** to:

Michael Ginsberg
Patricia Schmidt
ASSISTANT ATTORNEYS GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov

Michele Beck
Executive Director
COMMITTEE OF CONSUMER
SERVICES
500 Heber Wells Building
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov

Mark Moench
Yvonne R. Hogle
Daniel Solander
Jeff Larsen
ROCKY MOUNTAIN POWER
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
yvonne.hogle@pacificcorp.com
Daniel.solander@pacificcorp.com
jeff.larsen@pacificcorp.com
Mark.moench@pacificcorp.com

William Powell
Phil Powlick
DIVISION OF PUBLIC UTILITIES
500 Heber Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
wpowell@utah.gov
Philippowlick@utah.gov

Paul Proctor
ASSISTANT ATTORNEYS GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Cheryl Murray
Dan Gimble
UTAH COMMITTEE OF
CONSUMER SERVICES
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
cmurray@utah.gov
dgimble@utah.gov

/s/ Colette V. Dubois
