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Date submitted April 5, 2011

**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.	<b>Docket No. 10-035-124</b>  <b>PETITION TO INTERVENE OF IBEW LOCAL 57</b>
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Pursuant to Utah Code Ann. §63G-4-207 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 and manpower staffing levels. 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. Petitioner acknowledges the deadline for intervention was March 31, 2011 and represents that granting intervention based upon this late filing will not prejudice any party but will serve the public interest. Petitioner's decision to now file is based upon recent information and developments upon which it now feels it is desirable for it to intervene in this proceeding.

7. Notices and pleading should be sent to:

ARTHUR F. SANDACK, Esq  
8 East Broadway, Ste 411  
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Electronic filings, notices and orders should be sent by email to [asandack@msn.com](mailto: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 5<sup>th</sup> day of April, 2011.

s/\_\_\_\_\_  
Arthur F. Sandack

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 5<sup>th</sup> day of April, 2011, to the following:

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