

Stephen F. Mecham (4089)
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, Utah 84133
Telephone: 801 530-7300
Fax: 801 364-9127
Email: sfmecham@cnmlaw.com
Attorneys for the Utah Rural Telecom Association

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	<p style="text-align: center;">DOCKET NO. 10-035-124</p> <p style="text-align: center;">Petition to Intervene of the Utah Rural Telecom Association and Association Members</p>
---	---

The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members All West Communications, Bear Lake Communications, Beehive Telephone Company, Carbon/Emery Telcom, Central Utah Telephone, Direct Communications Cedar Valley, Emery Telcom, Gunnison Telephone, Hanksville Telcom, Manti Telephone, Skyline Telecom, South Central Utah Telephone Association, Strata Networks, and Union Telephone (“URTA members”) petition the Public Service Commission (“Commission”) to intervene in the above-entitled matter pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7 of the Utah Administrative Code.

The grounds for this petition are as follows:

1. URTA members are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission.
2. Rocky Mountain Power is proposing to change “...the Company’s Schedule 4

pole attachment rate to reflect the Administrative Support cost for managing the joint use of the Company's poles and to include a fee schedule of non-recurring charges as part of Schedule 4.”¹

3. URTA members attach to Rocky Mountain Power poles, have pole attachment agreements with Rocky Mountain Power, and are concerned about the changes the Company is proposing.
4. During the past eight years, URTA and URTA members have intervened and participated in every proceeding in which Rocky Mountain Power has sought to change its pole attachment policies and rates. This is the first time the Company has pursued such changes in a rate case.
5. URTA and URTA members therefore have a significant interest in the above-captioned matter and their legal interests may be substantially affected by the outcome.
6. URTA's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings. URTA will follow the schedule the Commission established in this proceeding.

If this petition is granted, URTA requests that copies of all notices and filings in this docket be served on:

Stephen F. Mecham
Callister Nebeker & McCullough
10 East South Temple Suite 900
Salt Lake City, Utah 84133
Telephone: 801 530-7300
Facsimile: 801 364-9127
Email: sfmecham@cnmlaw.com

¹ Testimony of Jeffrey M. Kent at line 24-27.

NOW THEREFORE, URTA respectfully requests that the Commission enter an Order granting URTA's petition to intervene in this docket allowing URTA and URTA members to participate to the fullest extent allowed by law.

Dated this 3rd day of March, 2011.

Callister Nebeker & McCullough

Stephen F. Mecham

Certificate of Service

I hereby certify that on March 3, 2011, I caused a true and correct copy of the Petition to Intervene of the Utah Rural Telecom Association and Association Members filed in Docket No. 10-035-124 to be emailed to the following:

Paul Proctor
pproctor@utah.gov

Chris Parker
William Powell
ChrisParker@utah.gov
wpowell@utah.gov

Gary A. Dodge
gdodge@hjdllaw.com

Cheryl Murray
Michele Beck
cmurray@utah.gov
mbeck@utah.gov

Patricia Schmid
Felise Thorpe Moll
pschmid@utah.gov
fthorpemoll@utah.gov

Gary A. Dodge
gdodge@hjdllaw.com

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
bobreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com

Betsy Wolf
bwolf@slcap.org

Peter J. Mattheis
Eric J. Lacey
pjm@bbrslaw.com
elacey@bbrslaw.com

Gerald H. Kinghorn
Jeremy R. Cook
ghk@pkhlawyers.com
jrc@pkhlawyers.com

Stephen J. Baron
sbaron@jkenn.com

Holly Rachel Smith
holly@raysmithlaw.com

Ryan L. Kelly
ryan@kellybramwell.com

Steve W. Chriss
stephen.chriss@wal-mart.com

/s/Stephen F. Mecham