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Attorneys for Comcast Cable Communications, LLC

Submitted March 16, 2011

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)
In the Matter of the Application of Rocky) Docket No. 10-035-124
Mountain Power for Authority to Increase its)
Retail Electric Utility Service Rates in Utah) PETITION TO INTERVENE
and for Approval of its Proposed Electric)
Service Schedules and Electric Service)
Regulations)
)

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Comcast Cable Communications, LLC, on behalf of its operating subsidiaries and affiliates ("Comcast"), respectfully petitions the Public Service Commission of Utah (the "Commission") for leave to intervene in the above-captioned matter concerning the application of Rocky Mountain Power for authority to increase its rates in Utah and for approval of its proposed service schedules and regulations, which includes changes to its Electric Service Schedule 4, Pole Attachments. In support of its petition, Comcast represents and states as follows:

1. Comcast, through its subsidiary, Comcast Phone of Utah, LLC, is authorized to

provide public telecommunications services within the State of Utah and is in compliance with

the requirements of its Certificate. Comcast, by and through its subsidiaries, is the nation's

largest cable operator with cable systems in Utah and provides video services and broadband

services.

2. As a provider of telecommunications services, video services, and broadband

services in Utah, Comcast is attached to more than 116,000 poles in Utah that are owned by

Rocky Mountain Power. As such, Comcast is directly impacted by the Application of Rocky

Mountain Power, which could potentially result in cost increases or delays. Thus, Comcast's

legal interests would be substantially and directly affected by the outcome of this proceeding.

3. Comcast's legal interests, absent its intervention, would not be adequately

represented by any other party to this proceeding.

4. The interests of justice and the orderly and prompt conduct of this proceeding will

not be materially impaired by allowing Comcast to intervene.

5. If this petition is granted, notices and filings in this proceeding should be sent to:

Sharon M. Bertelsen

Ballard Spahr LLP

One Utah Center, Suite 800

201 South Main Street

Salt Lake City, Utah 84111

Email: bertelsens@ballardspahr.com

WHEREFORE, Comcast requests leave to intervene in this proceeding to protect its

interests as they may appear.

Certificate of Public Convenience and Necessity No. 2383 ("Certificate") was issued in Utah Docket No. 01-2383-01 on January 11, 2002, to AT&T Broadband Phone of Utah, LLC. On February 12, 2003, the

Commission approved a name change to Comcast Phone of Utah, LLC. See Docket No. 03-2383-01.

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RESPECTFULLY SUBMITTED this 16th day of March, 2011.

Comcast Cable Communications, LLC

/s/ Sharon M. Bertelsen

Jerold G. Oldroyd, Esq. Sharon M. Bertelsen, Esq. Theresa A. Foxley, Esq. BALLARD SPAHR LLP One Utah Center, Suite 800 201 South Main Street Salt Lake City, Utah 84111

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of March, 2011, an original, five (5) true and correct copies, and an electronic copy of the foregoing **PETITION TO INTERVENE** were hand-delivered to:

Julie P. Orchard Commission Secretary Public Service Commission of Utah 160 East 300 South, 4th Floor Salt Lake City, Utah 84111 psc@utah.gov

and a true and correct copy, was emailed to:

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