Catherine Murray Director, Regulatory Affairs Electric Lightwave, LLC Portland, Oregon 97232 Telephone: (763) 745-8466 Facsimile: (763) 745-8459 cathy.murray@integratelecom.com

Submitted July 23, 2010

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

	)	Docket No. 10-035-43
In the Matter of the Application of Rocky	)	
Mountain Power for Approval of Standard	)	ELECTRIC LIGHTWAVE, LLC's
Non-reciprocal Pole Attachment Agreement	)	PETITION TO INTERVENE
	)	
	)	

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Integra Telecom of Utah, Inc., Electric Lightwave, LLC, and Eschelon Telecom of Utah, Inc. (collectively "Integra") hereby moves for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah. In support of this Motion, Integra states as follows:

1. Rocky Mountain Power requested an order under Utah Admin. Code R746-345-3 approving a standard form Non-Reciprocal Pole Attachment Agreement (the "Agreement") to be utilized between Rocky Mountain Power and cable and/or telecommunications companies desiring to attach facilities to the Rocky Mountain Power's distribution poles on or about April 26, 2010.

2. Integra is a competitive local exchange carrier certified by the Public Service Commission of Utah to provide telecommunications services in the State of Utah. 3. Integra has thousands of pole attachments with Rocky Mountain Power in the State of Utah.

4. Integra's customers in Utah may be impacted by Integra's ability to attach to Rocky Mountain Power's poles upon just and reasonable rates, terms, and conditions.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Integra to intervene.

6. The name, address, and telephone number of the person to whom communications should be addressed is:

Cathy Murray Manager, Regulatory Affairs Department of Law & Policy Integra Telecom 6160 Golden Hills Drive Golden Valley, MN 55416 Voice: (763) 745-8466 Fax: (763) 745-8459 Email: <u>catherine.murray@integratelecom.com</u>

WHEREFORE, for the reasons set forth above, Integra requests that the Public Service Commission of Utah grant this timely Motion to Intervene and permit Integra to participate in this proceeding to the full extent allowed by the rules of the Commission and by Utah law.

Dated this 23rd day of July, 2010.

Electric Lightwave, LLC

s/Catherine Murray Catherine Murray Director, Regulatory Affairs Electric Lightwave, LLC Portland, Oregon 97232 Telephone: (763) 745-8466 Facsimile: (763) 745-8459 camurray@integratelecom.com