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Attorney for CenturyLink

**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.	Docket No. 11-035-200  CENTURYLINK'S PETITION TO INTERVENE
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Pursuant to the Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R476-100-7 and § 63-46b-9, Qwest Corporation d/b/a CenturyLink (“CenturyLink”) respectfully petitions to intervene in the above-referenced proceeding before the Public Service Commission of Utah (“Commission”). As grounds for such intervention, CenturyLink states that it has legal rights or interests that are or may be substantially affected by these proceedings, that there are facts which support this position detailed below, and that CenturyLink requests that it be allowed intervention.

In support of this Petition, CenturyLink states as follows:

1. As a provider of telecommunications services, video services, and broadband services in Utah, CenturyLink is attached to slightly more than 44,000 poles in Utah that are owned by Rocky Mountain Power. As such, CenturyLink is directly impacted by the

Application of Rocky Mountain Power. Thus, CenturyLink's legal interests would be substantially and directly be affected by the outcome of this proceeding.

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

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

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**WHEREFORE**, for the reasons set forth above, CenturyLink requests that the Commission grant this timely petition to intervene and permit CenturyLink to participate in this proceeding to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 13<sup>th</sup> day of April, 2012.

CENTURYLINK



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Of attorneys for CenturyLink