Steven F. Alder, Esq. #0033 Assistant Attorney General Jan Graham, Esq. #1231 Utah Attorney General #3 Triad Center, Suite 475 355 West North Temple Salt Lake City, Utah 84180-1204 Telephone: (801) 536-8214

Attorneys for Intervenor-Applicant Utah Department of Natural Resources APPROVED BY COMMISSIONERS STEPHENF MECHAM MM (11/1/94 JAMES M. BYRNE MME)0/11/94 STEPHEN C. HEWLETT MME)0/11/94 SEP 33 10 18 MM SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF PACIFICORP FOR AN ORDER APPROVING ITS AVOIDED COST RATES

CASE NO. 94-2035-03

PETITION TO INTERVENE OF UTAH DEPARTMENT OF NATURAL RESOURCES

Pursuant to Utah Code Ann. § 63-46b-9 and Rule R746-100-7, Utah Department of Natural Resources hereby moves this Commission for leave to intervene in these proceedings. In support of this Petition, the Department of Natural Resources, hereinafter the "Department", states as follows:

1. The chief administrative officer of the Department of Natural Resources is designated by Utah Code Ann. § 63-34-5 with responsibility to coordinate state functions regarding energy development, to facilitate development and implementation of policies and programs relating to energy, and to participate in regulatory proceedings as appropriate to the functions and duties of the Department. 2. The proceedings in this matter will affect the policy and programs of the state of Utah as an energy user.

3. The rulings and proceedings pursuant to this Petition will affect the policy and development of energy production in the state of Utah, and the participation of the Department is appropriate in order to facilitate development of a policy consistent with the best interests of the State.

4. The Executive Director has delegated to the Office of Energy and Resource Planning his responsibilities under § 63-34-5 above and will participate in these proceedings through the representation by that Office.

WHEREFORE, the Executive Director of the Utah Department of Natural Resources requests leave to intervene in these proceedings to protect its interests as they may appear through the representation by the Office of Energy and Resource Planning.

DATED this 20 day of Sept., 1994.

UTAH ATTORNEY GENERAL

Steven F. Alder Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Petition to

Intervene" was mailed, postage prepaid, this 30th day of Setember_, 1994, to the

following:

Edward A. Hunter, Jr., Esq. Stoel Rives Boley Jones & Grey One Utah Center 201 South Main Street, Suite 1100 Salt Lake City, Utah 84111-4904

Michael Ginsberg, Esq. Division of Public Utilities 4120 State Office Building Salt Lake city, Utah 84114

Kent Walgren Committee of Consumer Services 4120 State Office Building Salt Lake City, Utah 84114

Peter Mattheis, Esq. Brickfield Burchett & Ritts 1025 Thomas Jefferson Street, N.W. Eighth Floor, West Tower Washington, DC 20007

F. Robert Reeder, Esq. Parsons, Behle & Latimer 201 South Main Street, #1800 P.O. Box 11898 Salt Lake City, Utah 84147

Brian W. Burnett, Esq. Callister, Duncan & Nebeker 10 East South Temple, #800 Salt Lake City, Utah 84133 John T. Nielsen, Esq. Van Cott, Bagley, Cornwall & McCarthy 50 South Main Street, Suite 1600 P.O. Box 45340 Salt Lake City, Utah 84145

Gary A. Dodge, Esq. Kimball, Parr, Crockett & Waddoups 185 South State Street, Suite 1300 P.O. Box 11019 Salt Lake City, Utah 84147

Michelle Carrillo