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UTAH PUBLIC SERVICE COMMISSION

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF PACIFICORP FOR AN ORDER APPROVING ITS AVOIDED COST RATES	))))	Docket No. 94-2035-03 AMENDED PETITION OF CHEVRON U.S.A. PRODUCTS TO INTERVENE

Pursuant to the Commission's Scheduling Order issued September 15, 1994, and with reference to the Commission's invitation for interventions to discuss the issue of the scope of this proceeding, Chevron U.S.A. Products Company ("Chevron") hereby respectively petitions this Commission to re-examine the scope and breadth of the above-captioned docket for the following reasons:

1. Chevron believes that the Commission's Order is appropriate with respect to limiting the docket to issues involving the method of calculation of avoided costs and deferring other issues concerning demand side resource cost effectiveness and net loss revenues to another time. However, Chevron believes that limiting the docket to the examination of those calculations as they relate to qualifying facilities that produce under 1,000 kW is essentially a meaningless exercise. A generic formulation of avoided costs in such a limited scope will not allow intervenors to address issues related to avoided cost calculations for projects in excess of 1,000 kW. Such

issues are clearly germane to any party including Chevron contemplating development of a qualifying facility whose energy output would be of any interest whatever to a potential customer such as PacifiCorp.

2. This Commission in its April 23, 1992 Order in Docket No. 91-2035-01 invited parties to examine avoided cost issues for PacifiCorp. Chevron believes if the Commission at that time was suggesting that other issues should be examined, it was not and should not at this time limit that examination to purchase from QF's 1,000 kW or less in size.

3. At page 14 of PacifiCorp's Prefiled Testimony of Roger Weaver, the Company asserts that the methodology for calculating avoided costs is desirable because it allows potential developers and this Commission to evaluate potential projects in a timely and cost efficient manner. (See Weaver Prefiled Testimony, lines 20-24.) Because, as a practical manner, these potential developers are going to be interested in projects in excess of 1,000 kW, limiting the docket to such de minimis energy output gives no help whatever to potential developers for larger projects. The avoided cost methodology and calculations proposed by this docket are of little value to potential developers or this Commission in evaluating potential projects.

Accordingly, Chevron respectively requests that this Commission re-examine the breadth and scope of its previous order and allow the scope at least to require PacifiCorp to explain and disclose both the method of calculating avoided costs and the actual

calculation of those costs as they evaluate alternative resources including qualifying facilities in excess of 1,000 kW. It is further respectively requested that the Commission set an immediate additional prehearing conference to resolve the issues addressed herein and any others that may be the subject of additional interventions.

DATED this 29th day of September, 1994.

VAN COTT, BAGLEY, CORNWALL & McCARTHY

By _____

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CERTIFICATE OF MAILING

I hereby certify that I caused a true and correct copy of the within and foregoing AMENDED PETITION OF CHEVRON U.S.A. PRODUCTS TO INTERVENE to be mailed, postage prepaid, this 29th day of September, 1994, to the following:

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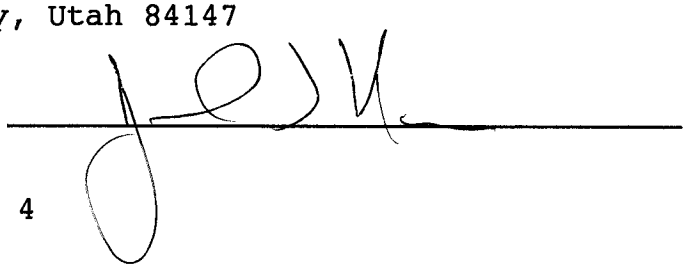

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