

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH**

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In the Matter of the Application of PacifiCorp	)	
and Scottish Power plc for an Order Approving	)	Docket No. 98-2035-04
the Issuance of PacifiCorp Common Stock	)	

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**PETITION FOR LEAVE TO INTERVENE**

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Pursuant to the Rules of Practice and Procedure of the Utah Public Service Commission ("Commission"), the Land and Water Fund of the Rockies ("LAW Fund") hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. The LAW Fund is a regional environmental law center serving the Rocky Mountain states. The LAW Fund has a Utah Steering Committee, a Utah Board member, and individual members who live in Utah and are PacifiCorp ratepayers.

2. The LAW Fund's Energy Project promotes energy efficiency, renewable resources, and other measures that help to minimize the environmental impacts of meeting the demand for energy services in an economically and politically acceptable fashion.

3. The LAW Fund has been involved in proceedings and other collaborative efforts in Utah for about five years, mainly on resource planning and demand-side management issues. As part of this work, we have represented a number of other Utah non-profit organizations interested in clean energy issues.

4. PacifiCorp is currently engaged in a number of activities that influence environmental quality in Utah including investing in renewable resources, running programs that

encourage customers to use energy more efficiently, participating in efforts to reduce regional haze, and facilitating a system-wide resource planning process.

5. The LAW Fund has an interest in the above-captioned proceeding because a change in the ownership and management of PacifiCorp, as contemplated by the proposed acquisition by Scottish Power, could have a substantial impact -- either positively or negatively -- on PacifiCorp's efforts to manage the impact of its activities on the environment.

6. Intervention by the LAW Fund will not unduly broaden the issues or delay the proceeding.

7. The LAW Fund requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Eric Blank  
Land and Water Fund of the Rockies  
2260 Baseline Rd., Suite 200  
Boulder, CO 80302

WHEREFORE, the LAW Fund respectfully requests that the Commission issue an order granting it leave to intervene in the above-captioned proceedings.

DATED this 9<sup>th</sup> day of February 1999.

Respectfully submitted,

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ERIC BLANK, Director  
LAW Fund Energy Project  
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CERTIFICATE OF SERVICE

I hereby certify that the original and eight (8) copies of the PETITION FOR LEAVE TO INTERVENE OF THE LAND AND WATER FUND OF THE ROCKIES was sent via Federal Express to Stephen F. Mecham, Chairman, Public Service Commission of Utah, 160 East 300 South, Salt Lake City, Utah 84145, on this 9th day of February, 1999, and a true and correct copy was sent by U.S. mail, first-class and postage prepaid, to the following persons:

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