

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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

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Pursuant to the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), The Salt Lake Community Action Program and the Crossroads Urban Center hereby petition for leave to intervene in the above-captioned docket and, in support thereof, state as follows:

1. The Salt Lake Community Action Program (CAP) is a private nonprofit community-based organization that addresses the needs of low-income people through service delivery and advocacy.
2. Crossroads Urban Center (Crossroads) is a nonprofit community-based organization serving the needs of low-income people in the Salt Lake Metropolitan Area.
3. CAP and Crossroads have a special interest in ensuring that the people they represent are charged fair and reasonable electric rates. Any final order issued by the Commission affecting the ownership of PacifiCorp may have an impact on residential electric customers and the price that residential electric customers will have to pay.
4. Furthermore, since Salt Lake Community Action Program and Crossroads Urban Center represent low income people, those organizations have a particular interest in ensuring that electric utility rates remain as low as possible since people with limited incomes pay such a disproportionate share of their income for electric service.
5. Accordingly, CAP and Crossroads possess a direct and substantial interest

in the subject matter of this case, and seek via this intervention petition to protect that interest as it may appear. Participation in this docket will be in the public interest and may also be of particular assistance to the Commission in rendering informed decisions on the issues that will likely be raised.

6. Intervention by CAP and Crossroads will not delay the proceeding or unduly burden the other parties in the proceeding.

7. CAP and Crossroads request that all pleadings, correspondence, discovery, and other documents be served on:

Dr. Charles E. Johnson  
1338 Foothill Blvd. Suite 134  
Salt Lake City, Utah 84108  
FAX: (801) 274-0075  
VOICE: (801) 274-2605

Respectfully submitted this \_\_\_\_\_ day of  
February, 1999.

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Betsy Wolf, Utility Ratepayer Advocate  
Salt Lake Community Action Program

Jeff Fox  
Urban Crossroads Center

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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

Salt Lake Community Action Program (CAP) and Crossroads Urban Center (Crossroads) represent the interests of low-income residential customers of PacifiCorp in Utah. In that regard, they raise the following issues in the request of PacifiCorp and Scottish Power plc in this proceeding:

What will be the impact of the merger on low-income customers, both in the near term and in the longer term?

What will be the impact of the merger on the provision of customer service?

What will be the impact of the merger on energy conservation programs?

What will be the impact of the merger on the disposition of assets of PacifiCorp?

CAP and Crossroads expect to explore these issues and issues raised by other parties in this proceeding, paying special attention to any issues raised that may affect low-income customers.

Respectfully submitted this \_\_\_\_\_ day of  
February, 1999.

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Betsy Wolf, Utility Ratepayer Advocate

Salt Lake Community Action Program

Jeff Fox  
Urban Crossroads Center

## CERTIFICATE OF SERVICE

This is to certify that on this \_\_\_\_\_ day of February, 1999 I caused to be filed with the Public Service Commission of Utah the original and 15 copies of this Petition for Leave to Intervene and List of Issues in Utah PSC Docket No 98-2035-04 of The Salt Lake Community Action Program and the Urban Crossroads Center and delivered by hand or First Class Mail copies to the following parties:

### Utah Power & Light Company

Douglas Larson  
Utah Power & Light Company  
One Utah Center  
201 South Main, Ste 800  
Salt Lake City, UT 84140-0800

Anne E. Eakin  
Vice President, Regulation  
PacifiCorp  
825 NE Multnomah Street  
Portland, Oregon 97332

Edward Hunter  
John Eriksson  
Stoel Rives LLP  
201 South Main, Ste 1100  
Salt Lake City, UT 84111-4904

### Scottish Power plc

Brian W. Burnett, Esq.  
Calister Nebeker & McCullough  
Gateway Tower East Suite 900  
10 East South Temple  
Salt Lake City, Utah 84133

Robert Green  
Scottish Power plc  
121 SW Morrison, Suite 1800  
Portland, Oregon 97204

Lawrence H. Reichman  
PERKINS COLE LLP  
1211 SW Fifth Avenue, Suite 1500  
Portland, Oregon 97204

### Land and Water Fund of the Rockies

Eric Blank  
Land and Water Fund of the Rockies  
2260 Baseline Road, suite 200  
Boulder, CO 80302

### Division of Public Utilities

Michael L. Ginsberg  
Assistant Attorney General  
Division of Public Utilities  
160 East 300 South 5th Floor  
Salt Lake City, Utah 84111

### Committee of Consumer Services

Douglas Tingey  
Assistant Attorney General  
Committee of Consumer Services  
160 East 300 South, 5th Floor  
Salt Lake City, Utah 84111

### Nucor Steel

Peter J. Mattheis  
Dean S. Brockbank  
BRICKFIELD, BURCHETTE & RITTS, P.C.  
1025 Thomas Jefferson Street, NW  
800 West Tower  
Washington, D.C. 20007

Glen E. Davies  
PARSONS, DAVIES, KINGHORN & PETERS, P.C.  
185 South State Street  
Suite 700  
Salt Lake City, Utah 85111

Curtis Broadbent  
Controller  
NUCOR STEEL  
P.O. Box 100

Plymouth, Utah 84330

Kimball, Parr, Waddoups, Brown & Gee  
PO Box 45898  
Salt Lake City, Utah 84145-0898

### Utah Industrial Energy Consumers

F. Robert Reeder  
William J. Evans  
Parsons Behle & Latimer  
201 South Main Street Suite 1800  
Salt Lake City, Utah 84145-0898

### Emery County

Bill Thomas Peters  
David W. Scofield  
PARSONS DAVIES KINGHORN & PETERS  
185 South State Street, Suite 700  
Salt Lake City, Utah 84111

Jim Matheson  
Dr. Robert Malko  
The Matheson Group  
466 East 500 South, Suite 200  
Salt Lake City, Utah 84111

### Office of Energy & Resource Planning, State of Utah (OERP)

Daniel G. Moquin, No. 7585  
Assistant Attorney General  
1594 West North Temple, #300  
Salt Lake City, Utah 84116

### Alliant Techsystems, Inc.

### Hexcell Corporation

### Thiokol Corporation

### Chevron

### SF Phosphates

### E.A. Miller, Inc.

### IHC Hospitals, Inc.

### Geneva Steel

### Western Electrochemical Company

### Utah Electric Deregulation Group

### Utah Associated Municipal Power Systems

Gary A. Dodge

### Utah League of Cities and Towns

Roger O. Tew  
60 South 600 East Suite 200  
Salt Lake City, Utah 84102

Steven Allred  
Salt Lake City Corp. Law Dept.  
451 South State Street Suite 505  
Salt Lake City, Utah 84111

Paul T. Morris  
3600 Constitution Blvd.  
West Valley City, Utah 84119

### Utah Farm Bureau

Stephen R. Randle  
RANDLE, DEAMER, ZARR, ROMRELL & LEE PC  
139 East South Temple, Suite 330  
Salt Lake City, Utah, 84111

Respectfully,

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Betsy Wolf