

The Thomas O. and Mary A. Breitling Family Trust

4794 South 2124 East

Holladay, Utah 84117

277-3419

July 1, 1999

Utah Public Service Commission

160 East 300 South, Fourth Floor

Salt Lake City, Utah 84111

Re: Request to Intervene in PacifiCorp-ScottishPower Case

Members of the Commission:

I know that I am late in requesting to intervene in the Public Service Commission's decision on merger of PacifiCorp and ScottishPower, but request that the Commission waive my failure to respond within the proper time and permit my objections to the merger to be heard.

I object to the merger for the following reasons as a customer, as a stockholder, and as a retired professional engineer who knew the capabilities of UP&L and its employees:

- As a customer, even if we have 800 numbers to call for service from a remotely located dispatcher attempting to get a response from Utah-based workers, I anticipate similar service to that on Creek Road in Salt Lake County when the Portland dispatcher had no repair completed until about five hours or more. All that PacifiCorp and ScottishPower talk about is economizing on labor.
- As a stockholder during most of PacifiCorp's existence, I have seen the big pot of money created by the merger used to overpay executives and directors who made major errors in judgment in entering the mining business which caused a loss to stockholders of \$300-million, when Kennecott had to take it off the hands of PacifiCorp. This was followed by the employment of Frederick W. Buckman who launched the money-losing ventures into England and Australia, the gas business in Texas, and the wasteful attempted buyout in Kentucky.
- The directors and executives have now given us Keith McKinnon who, apparently, has masterminded the sell-off of Utah Power and Pacific Power to a former British government corporation which, as a private company, only has a few years of operation under its belt. Such a company is similar to privatizing TVA. Almost anyone would succeed for a few years if he started with privatized TVA. If PacifiCorp were an information company, where it is owned might be less crucial, but Utah Power has extensive plant and equipment in its territory, and I do not want to see it continue to be bought and sold like properties on a Monopoly Board.
- The documents show that the merger has no advantages for UP&L customers, workers, and stockholders. Its benefits accrue to directors and executives of the two companies. This merger and privatization will lead to unregulated monopoly with its "Standard Oil" consequences. If not stopped, one or a few major combines will cover the first-world countries with their unregulated monopoly and consequent pricing. And, I expect to see the artificial spread between the market prices of PacifiCorp and ScottishPower stock evaporate as approval of the merger nears, eliminating that inducement to merge. PSC saved UP&L customers from PacifiCorp's excessive pricing in this state with its spring 1999 order.
- At the stockholders' meeting, Keith McKinnon, chairman, called for motion to merge, second of motion, and immediate vote, without allowing or even asking if there was any discussion. But, he later heard from stockholders who clearly expressed dissatisfaction with everything PacifiCorp has done up to the present time. Utah stockholders were uniformly against the merger.

Sincerely,

Thomas O. Breitling