

Liberty Homes, Inc.
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Submitted September 21, 2004

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF)
QWEST CORPORATION’S LAND)
DEVELOPMENT AGREEMENTS (LDA))
TARIFF PROVISIONS)

) Docket No. 03-049-62
)
) **Liberty Homes, Inc.**
) **PETITION TO INTERVENE**
)
)

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Rule 746-100-7, Liberty Homes, Inc. respectfully petitions the Public Service Commission of Utah (the “Commission”) for leave to intervene in the above-captioned proceeding concerning Qwest Corporation’s Land Development Agreements tariff provisions in the state of Utah. In support of its petition, Liberty Homes, Inc. represents and states as follows:

1. Liberty Homes, Inc. is a Land Developer and Builder formed to develop residential projects throughout the state of Utah.
2. As a developer, Liberty Homes, Inc. is required to provide access to utility services in their projects. The outcome of Qwest Corporation’s LDA Tariff docket could result in significant added construction time and costs to Liberty Homes, Inc.. Thus, the legal interests of Liberty Homes, Inc. could be directly affected by the outcome of this proceeding.

3. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing Liberty Homes, Inc. to intervene.

WHEREFORE, Liberty Homes, Inc. respectfully requests that the Commission enter an Order granting Liberty Homes, Inc.'s Petition to Intervene as a party in this docket, allowing Liberty Homes, Inc. to participate to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 21st day of September, 2004.

Liberty Homes, Inc.

By: Richard Welch
Title: VP Land

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of September, 2004 an original, with five (5) true and correct copies and an electronic copy, of Liberty Homes, Inc's **PETITION TO INTERVENE** was hand-delivered to:

Julie Orchard
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, Utah 84114
lmathie@utah.gov

and a true and correct copy was mailed, postage prepaid thereon, to:

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