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Attorneys for the County

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PACIFICORP for an Increase in Rates and Changes	MOTION TO INTERVENE Docket No. 01-035-01
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Pursuant to the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), Emery County and Millard County hereby petition for motion to intervene in the above-captioned docket and, in support thereof, state as follows:

1. Emery County is a political subdivision of the State of Utah.
2. Millard County is a political subdivision of the State of Utah.
3. Emery and Millard County each have substantial power generating and transmission facilities located within their respective counties the value of which could be seriously impacted by the proposed actions of the applicant. Any change in the rates of PacifiCorp may have an economic impact on the Emery and Millard Counties and their ability to provide required governmental services to the residents of Emery and Millard County.
4. Accordingly, Emery and Millard County 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.
5. Intervention by Emery and Millard County will not delay the proceeding or unduly burden the other parties in the proceeding.

6. Emery and Millard County request that all pleadings, correspondence, discovery, and other documents be served on:

Parsons, Davies, Kinghorn & Peters
Attention: Bill Thomas Peters
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Respectfully submitted this _____ day of January, 2001.

Parsons, Davies, Kinghorn & Peters

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