

Capt Robert C. Cottrell, Jr.  
AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350  
Date Submitted: 18 January 2001

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

<b>In the Matter of the Application</b>	)	<b>Docket No. 01-035-01</b>
<b>Of PacifiCorp for an Increase in</b>	)	
<b>Its Rates and Charges</b>	)	<b>MOTION FOR LEAVE TO</b>
	)	<b>INTERVENE</b>

---

Now comes the United States Executive Agencies (“USEA”), by and through its counsel, Captain Robert C. Cottrell, Jr., and pursuant to Utah Admin. R. R746-100-7 (2000) and Utah Code Ann. § 63-46b-9, respectfully requests that the Commission grant this Motion for Leave to Intervene.

In support thereof USEA states:

1. That under Docket No. 01-035-01, PacifiCorp, doing business as Utah Power & Light Company (“PacifiCorp” or “Company”), has applied to the Utah Public Service Commission for an order authorizing a general increase in its rates and charges for electric service in the state of Utah.
2. That PacifiCorp has also filed a request for an interim rate increase to be effective on 22 January 2001.
3. That USEA operates several facilities within Utah, including Hill Air Force Base, Tooele Army Depot, Ogden Army Depot, and Dugway Proving Grounds.
4. That these facilities currently receive electric service from PacifiCorp.

5. That the rates paid by USEA for electric service are likely to be affected by the outcome of this proceeding.

6. That USEA has a substantial interest in this proceeding.

Wherefore, USEA prays that the Commission grant it the following relief:

A. That it be granted Leave to Intervene in and become a party to this proceeding;

B. That the following be added to the service list in this proceeding:

Capt Robert C. Cottrell, Jr.  
AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319

Michael R. Lund  
OO-ALC/JAN  
6026 Cedar Lane, Bldg 1278  
Hill AFB, UT 84056

C. That the Commission grant such other relief as it deems appropriate.

Respectfully submitted,

UNITED STATES EXECUTIVE AGENCIES

---

Captain Robert C. Cottrell, Jr.  
Utility Litigation Team  
General Litigation Division  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350

Dated: \_\_\_\_\_

Capt Robert C. Cottrell, Jr.  
AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350  
Date Submitted: 18 January 2001

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

<b>In the Matter of the Application</b>	)	<b>Docket No. 01-035-01</b>
<b>Of PacifiCorp for an Increase in</b>	)	
<b>Its Rates and Charges</b>	)	<b>CERTIFICATE OF SERVICE</b>
	)	

---

I HEREBY CERTIFY that true and correct copies of the U.S. Executive Agencies' Motion to Intervene and Appendix A to Protective Order and were mailed to each of the following this \_\_\_\_\_ day of January 2001:

Edward A. Hunter  
John M. Eriksson  
STOEL RIVES LLP  
Attorneys for PacifiCorp  
One Utah Center  
201 South Main Street, Suite #1100  
Salt Lake City, UT 84111-4904

Matthew Wright  
Vice President, Regulation  
PacifiCorp  
825 N.E. Multnomah, Suite #800  
Portland, OR 97232

Douglas Larson  
PacifiCorp  
Director, Regulatory Policy  
201 South Main Street, Suite #2300  
Salt Lake City, UT 84140

Michael Ginsberg  
Kent Walgren  
Attorneys for the Division of Public Utilities  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111

Doug Tingey  
Attorney for the Committee of Consumer Services  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111

Gary A. Dodge  
Brent O. Hatch  
Attorneys for the Utah Association of Energy Users  
Hatch, James, & Dodge  
10 West Broadway, Suite #400  
Salt Lake City, UT 84101

Scott Gutting  
Rick Anderson  
ENERGY STRATEGIES  
39 Market Street, Suite #200  
Salt Lake City, UT 84101

Dr. Charles E. Johnson  
Attorney for the Utah Ratepayers Alliance  
1338 Foothill Blvd., PMB 134  
Salt Lake City, UT 84108

F. Robert Reeder  
William J. Evans  
Parsons Behle, & Latimer  
Attorneys for the Utah Industrial Energy Consumers  
201 South Main Street, Suite #1800  
Salt Lake City, UT 84111

---

Captain Robert C. Cottrell, Jr.  
Utility Litigation Team  
General Litigation Division  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350

Dated: \_\_\_\_\_

Capt Robert C. Cottrell, Jr.  
AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350  
Date Submitted: 18 January 2001

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

<b>In the Matter of the Application</b>	)	<b>Docket No. 01-035-01</b>
<b>Of PacifiCorp for an Increase in</b>	)	
<b>Its Rates and Charges</b>	)	<b>APPENDIX A TO PROTECTIVE</b>
	)	<b>ORDER – NONDISCLOSURE</b>
	)	<b>AGREEMENT</b>

---

I have reviewed the Protective Order entered by the Public Service Commission of Utah in Docket No. 01-035-01 on 12 January 2001 with respect to the review and use of Confidential Information and agree to comply with the terms and conditions of the Protective Order. Without limiting the foregoing, I agree that I will use any Confidential Information to which I am provided access solely for the purpose and in the matter for which it is disclosed, that I will not disclose the Confidential Information to or discuss it with any other person for any reason except with persons to whom I am authorized to disclose the Confidential Information pursuant to the terms of the Protective Order, that I will take reasonable precautions to protect the confidentiality of the Confidential Information and that I will not use the Confidential Information for any business or commercial purpose whatsoever.

Required information:

Robert C. Cottrell, Jr.

Residence: 1525 Donna Ave.  
Panama City, FL 32404

Employer: U.S. Air Force

Business: AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319

Party Represented: United States Executive Agencies

---

Captain Robert C. Cottrell, Jr.  
Utility Litigation Team  
General Litigation Division  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
(850) 283-6350

Dated: \_\_\_\_\_