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Attorney for Salt Lake City Corporation
and Million Solar Roofs Partnership

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In The Matter of Demand Side Management Cost Recovery) DOCKET NO. 02-035-T12) PETITION TO INTERVENE OF) SALT LAKE CITY CORPORATION AND) MILLION SOLAR ROOFS PARTNERSHIP
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In accordance with Rule R746-100-7 of the Commission's Rules of Practice and Utah Code § 63-46b-9, Salt Lake City Corporation and the Million Solar Roofs Partnership (MSR Partnership), petitions the Utah Public Service Commission for permission to intervene in this docket, and state:

I. NOTICES

The name, address, and telephone number of the persons to whom communications to MSR partnership should be sent are:

Marco B. Kunz
Salt Lake City Attorneys Office
451 South State Street, Suite 505A
Salt Lake City, Utah 84111
Telephone: (801) 535-6405
Facsimile: (801) 535-7640
E-mail: marco.kunz@ci.sl.c.ut.us

Richard Collins
Million Solar Roofs Partnership
Westminster College
1840 South 1300 East
Salt Lake City, UT 84105
Telephone : (801) 832-2665
Facsimile : (801) 832-3106
E-mail : rcollins@westminstercollege.edu

Sarah Wright
Million Solar Roofs Partnership
917 Second Ave.
Salt Lake City, UT 84103
Telephone : 673-7156
E-Mail : swrightutah@earthlink.net

II. IDENTITY OF PETITIONER

Salt Lake City is the capital city of Utah and Salt Lake City Corporation has intervened in numerous Commission proceedings as its interests have dictated. Salt Lake City Corporation and its consultants have entered into a partnership with the Department of Energy to promote photovoltaic rooftop panels. The goal is to lower financial and regulatory barriers for this renewable resource.

III. INTEREST OF PETITIONER

Salt Lake City Corporation, as a direct consumer of electricity from Utah Power and as a representative of its citizens, has a direct interest in the development of a Demand Side Management (DSM) cost recovery mechanism. Salt Lake City Corporation believes that this DSM tariff rider will help promote the development of energy efficiency measures and other peak shaving measures that will reduce the overall cost of providing electric service to Utah Power's customers. Salt Lake City Corporation and MSR Partnership are seeking to have funding for solar roof top panels included in the tariff.

IV. NATURE OF INTERVENTION

The evidence to be presented by Salt Lake City Corporation and the MSR Partnership , if any, will be of material value to the Commission in its determination of the issues involved in this proceeding, and Salt Lake City Corporation's and MSR Partnership's intervention will not broaden those issues or delay the proceedings.

Accordingly, Salt Lake City Corporation and MSR Partnership request permission to intervene as parties to this proceeding and to participate to the full extent permitted under the Commission's rules and Utah Law.

Submitted January 6, 2003.

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing PETITION TO INTERVENE to the below listed by electronic mail, this 6th day of January, 2003.

lmathie@Utah.gov

Marco B. Kunz