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Attorneys for AARP

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Evaluation of the : Docket No. 03-035-01
HELP Program :
:
: **AARP’S PETITION TO**
: **INTERVENE**
:
:
:

Pursuant to Utah Code Admin R. 746-100-7 and Utah Code Ann. § 63-46b-9, AARP “fka American Association of Retired Persons” (“AARP”) respectfully petitions the Commission for leave to intervene in this proceeding.

In support of this petition to intervene, AARP states as follows:

1. The Commission approved the implementation of a lifeline rate for low income customers (“HELP”) in Docket 99-035-10 (5/24/00).
2. In Docket no. 00-35-T07 (8/30/00), the Commission ordered capping annual program costs at or near \$1,856,000 and ordered Utah Power to monitor collections and disbursements.

3. AARP participated in the 2003 Utah Power general rate case. The 2003 Utah Power general rate case called for no changes in the HELP rate structure. Paul Mecham and Light and Truth disagreed.
4. The Commission determined that Docket no. -03-035-01 would be and was dedicated to evaluation of the HELP program.
5. The AARP is a nonprofit corporation organized to advance and improve the economic, educational, political, social interests and general welfare of persons over 50 years of age. It has over 35 million members and a network of local chapters. Many of its members are on fixed income.
6. AARP Utah has 182,000 members residing within this state, of which more than 150,000 are customers of Utah Power and are affected by the availability of electric power and the rates they pay Utah Power for electric service and the impact of the HELP program. Consequently, AARP has a direct, immediate, and substantial interest in this proceeding.
7. The interest of the AARP will not be adequately represented by any other party to this proceeding.
8. If the AARP is granted leave to intervene in this proceeding, it requests that service of all pleadings, notices, etc. be made to the following:
- | | | |
|--|---|--|
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9. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of AARP's Petition to Intervene.
10. The AARP has not yet determined the level of its participation or the precise nature of the relief it will seek, but requests that the Commission grant it intervention as its interest may appear. Submitted with this Motion to Intervene is the AARP's Proposed Statement of Issues.

WHEREFORE, the AARP requests that the Commission enter an Order granting the AARP permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this ____ day of May, 2005.

Dale F. Gardiner
Attorney for AARP

CERTIFICATE OF SERVICE

I hereby certify that a copy of the AARP'S PETITION TO INTERVENE in the Matter of the Evaluation of the HELP Program Docket No: 03-035-01 was distributed and transmitted electronically (e-mail) on the 12th day of May, 2005 to the following:

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Dated this _____ day of May, 2005.
