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Date Submitted: 17 March 2004

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)	Docket No. 03-035-14
PacifiCorp for Approval of an IRP-based)	
Avoided Cost Methodology for QF)	
Larger than One Megawatt)	MOTION FOR LEAVE TO
)	INTERVENE
)	

Now comes the United States Executive Agencies (“USEA”), by and through its counsel, Major Craig T. Paulson, 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. 03-035-14, PacifiCorp (“PacifiCorp” or “Company”), has applied to the Utah Public Service Commission for an order providing for avoided cost purchase amounts.
2. That USEA operates several facilities within Utah, including Hill Air Force Base, Tooele Army Depot, Dugway Proving Grounds, and Deseret Chemical Depot.
3. That these facilities currently receive electric service from PacifiCorp and in the future intend to operate a qualifying facility.

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

5. That USEA has a direct interest in the outcome of this proceeding. At this point in the process, USEA has not yet formulated what positions, if any, it will take regarding this filing.

6. That USEA's interests, due to the unique status of the Federal government cannot be adequately represented by any other party.

7. That USEA has a substantial interest in this proceeding and its inclusion would promote the interests of justice.

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:

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

Respectfully submitted,

UNITED STATES EXECUTIVE AGENCIES

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