

Gregory L. Probst  
c/o ENERGY STRATEGIES  
39 Market Street, Suite 200  
Salt Lake City, UT 84101  
Telephone: 801.355.4365  
Facsimile: 801.521.9142  
[glprobst@earthlink.net](mailto:glprobst@earthlink.net)

Attorney for Petitioners

---

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

In the Matter of the Application of PACIFICORP for Approval of an IRP-based Avoided Cost Methodology for QF Projects Larger than One Megawatt	<b>PETITION TO INTERVENE</b>  <b>DOCKET NO. 03-035-14</b>
--	---

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Code R746-100-7, the UAE Intervention Group, a sub-group of the Utah Association of Energy Users, comprised for purposes of this filing of Alliant Aerospace Propulsion Company, American Pacific Corporation, Central Valley Water Reclamation District, ChevronTexaco ERTC, IHC Health Services, Inc. and Swift & Company - Utah Corporation, (“Petitioners,” or “UAE”), hereby petitions for leave to intervene in this proceeding.

In support of their petition to intervene, Petitioners state as follows:

1. Petitioners represent a sub-group of the Utah Association of Energy Users, comprised of large Utah consumers of electrical power from the health services, petroleum, mining, chemical, metals and other industries.

2. The legal rights and interests of Petitioners may be substantially affected by this proceeding.

3. Petitioners have not fully determined the specific positions it will take or the relief they will seek. Petitioners seek to intervene for purposes of protecting their interests as they may appear.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioners to intervene. Petitioners do not seek to upset the current schedule in this matter. Petitioners respectfully request permission to file their direct testimony responding to the direct testimony filed by other parties by April 23, 2004. Petitioners will otherwise comply with the testimony and hearing schedules previously ordered by the Commission

5. Notices in this proceeding should be sent to the following:

Gregory L. Probst  
c/o Energy Strategies LLC  
Scott Gutting  
Neal Townsend  
Energy Strategies LLC  
39 Market Street, Suite 200  
Salt Lake City, UT 84101  
Telephone: 801.355.4365  
Facsimile: 801.521.9142  
e-mail: glprobst@earthlink.net  
sgutting@energystrat.com  
ntownsend@energystrat.com

WHEREFORE, Petitioners request leave to intervene in this proceeding to protect their interests as they may appear.

DATED this \_\_\_\_ day of April, 2004.

---

Gregory L. Probst  
Attorney for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by United States mail, postage prepaid, or by email this \_\_\_\_ day of \_\_\_\_\_, 2004, to the following:

Edward Hunter  
John Eriksson  
STOEL RIVES  
201 South Main Street, Suite 1100  
Salt Lake City, UT 84111  
eahunter@stoel.com  
jmeriksson@stoel.com  
Attorneys for PacifiCorp

Stephen F. Mecham  
CALLISTER NEBEKER & McCULLOUGH  
Gateway Tower East, Suite 900  
10 East South Temple  
Salt lake City, Utah 84133  
sfmecham@cnmlaw.com  
Attorneys for Desert Power L.P.

Michael Ginsberg  
Patricia Schmid  
ASSISTANT ATTORNEY GENERAL  
Division of Public Utilities  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111  
mginsbert@utah.gov  
pschmid@utah.gov  
Attorneys for Division of Public Utilities

Gary A. Dodge, Esq. #AO897  
HATCH JAMES & DODGE  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
Telephone: 801-363-6363  
Facsimile: 801-363-6666  
Attorneys for US Magnesium LLC

Reed Warnick  
ASSISTANT ATTORNEY GENERAL  
Committee of Consumer Services  
160 East 300 South, 5th Floor  
Salt Lake City, UT 84111  
rwarnick@utah.gov  
Attorneys for Committee of Consumer Services

---