

Roger Swenson
Vice President Regulatory Relations
Pioneer Ridge LLC & Mountain Wind LLC
1592 East 3350 South
Salt Lake City, Utah 84116

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the matter of the Application of	I	
Pacificorp for Approval of an IRP Based Avoided	I	
Cost Methodology for QF Projects Larger than	I	Motion to intervene of Pioneer Ridge LLC
1 Megawatt	I	and Mountain Wind LLC
	I	
	I	
	I	
	I	Docket No. 03-035-14
	I	
	I	

Pursuant to Utah Code Ann. 63-46b-9 and Utah Admin. Code R746-100-7, Pioneer Ridge LLC and Mountain Wind LLC, (“Wind Generators”) hereby move for intervention in the above referenced proceeding before the Public Service Commission of Utah. In support of this Motion, the Wind Generators state as follows:

1. The Wind Generators filed a petition for contract approval for approximately 48 MWs of nameplate wind generation capacity in Docket No. 05-035-09. An order in the 05-035-09 Docket directed Pacificorp to enter into good faith negotiations with the Wind Generators. Pacificorp’s good faith negotiations derive their basis from positions taken directly from testimony as filed by Pacificorp in May 2005 in Docket No. 05-035-14.
2. The Commission in its order in Docket No. 05-035-09 stated that any disputes that arise from Pacificorp using its preferred method would be consolidated in the 03-035-14 Docket.

3. PacifiCorp's preferred method of determining a price that will be paid to the Wind Generators include no value attributable for Green Tags, a determination of integration charges that lack clear evidentiary basis, a contribution of capacity value that is low by assumption. The Wind Generators dispute each of these specific issues. The Wind Generators also dispute a lack of positive adjustments for reduction in environmental cost exposure and price volatility exposure. As such disputes have become apparent in good faith negotiations in this matter they should now be taken up in this Docket No. 03-035-14.

4. The Wind Generator's full name and address for correspondence

Pioneer Ridge LLC & Mountain Wind LLC

Attn: Roger Swenson

1592 East 3350 South

Salt Lake City, Utah 84106

5. The Wind Generator's interest in the outcome of these proceedings will not be adequately represented by any other party, nor will the Wind Generator's participation impair the conduct of the proceeding.

6. The following person should be included on the service list in these proceedings and all communications concerning this matter should be addressed to:

Roger Swenson
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Wherefore, for the reasons set forth above, The Wind Generators requests that the Public Service Commission of Utah grant this Motion to Intervene and permit the Wind Generators to participate in this proceeding with full rights as a party. The wind projects also ask that testimony and

evidence that was provided in Docket No. 05-035-09 be consolidated and made part of the record in this matter in Docket No. 03-035-14.

Dated this ____ day of _____,2005.

Roger Swenson
VP Regulatory Relations

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Request for Intervention to be delivered to the following via e-mail or United States mail, postage prepaid at the addresses below on May 18, 2005:

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