

Gregory L. Probst  
9 Pepperwood Drive  
Sandy, Utah 84092  
[glprobst@earthlink.net](mailto:glprobst@earthlink.net)  
Attorney for Mountain West Consulting, LLC

---

**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

**PETITION TO INTERVENE**  
**DOCKET NO. 03-035-14**

---

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Code R746-100-7, Mountain West Consulting, LLC (“Petitioner,”), hereby petitions for leave to intervene in this proceeding.

In support of its petition to intervene, Petitioner states as follows:

1. Petitioner is an energy consulting company in the business of developing wind energy projects in the state of Utah. Petitioner has participated in meetings during development of PacifiCorp’s 2005 Integrated Resource Plan, has provided comments on the IRP concerning renewable energy issues and has participated in the subcommittee of the Task Force under this docket dealing with renewable energy issues.

2. The legal rights and/or interests of Petitioner may be substantially affected by this proceeding.

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

4. Petitioner's proposed intervention would not materially impair the interests of justice and the orderly and prompt conduct of this proceeding. Petitioner will comply with the testimony and hearing schedules previously ordered by the Commission.

5. Petitioner requests that notices in this proceeding be sent to the following:

Gregory L. Probst  
9 Pepperwood Drive  
Sandy, Utah 84092  
Attorney for Mountain West Consulting, LLC  
Telephone: 801.571-1107  
Facsimile: 801.576-1707  
e-mail: glprobst@earthlink.net

WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this \_\_\_\_ day of July, 2005.

---

Gregory L. Probst  
Attorney for Petitioner

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 \_\_\_\_\_, 2005, to the following:

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

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

Roger Swenson  
Vice President, Regulatory Relations  
Pioneer Ridge LLC  
1592 East 3350 South  
Salt Lake City, UT 84116  
[roger.swenson@prodigy.net](mailto:roger.swenson@prodigy.net)

Thorvald A. Nelson  
Holland & Hart LLP  
8390 E. Crescent Pkwy, Suite 400  
Greenwood Village, CO 80111  
tnelson@hollandhart.com  
Attorneys for ExxonMobil

Stephen F. Mecham  
Callister Nebeker & McCullough  
10 East South Temple, Suite 900  
Salt Lake City, Utah 84133

[sfmecham@cnmlaw.com](mailto:sfmecham@cnmlaw.com)  
Attorneys for Spring Canyon Energy LLC

Reed Warnick  
Paul Proctor  
Committee of Consumer Services  
160 East 300 South, 5th Floor  
Salt Lake City, UT 84111  
pproctor@utah.gov  
Attorneys for Committee of Consumer Services

Gary A. Dodge  
HATCH JAMES & DODGE  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
Telephone: 801-363-6363  
Facsimile: 801-363-6666  
[gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)  
Attorneys for UAE

Eric C. Guidry  
Western Resource Advocates  
2260 Baseline Road, Suite 200  
Boulder, CO 80302  
[eguidry@westernresources.org](mailto:eguidry@westernresources.org)  
Attorneys for WRA and UCE

Richard S. Collins  
1840 South 1300 East  
Salt Lake City, Utah 84105  
Telephone: 801-832-2665  
Facsimile: 801-832-3106  
Email: [rcollins@Westminster College.edu](mailto:rcollins@Westminster College.edu)  
Representing Wasatch Wind