ARTHUR F. SANDACK (#2854)

Attorney for Petitioner

8 East Broadway, Ste 510

Salt Lake City, Utah 84111

Telephone: (801) 532-7858

Date Submitted: September 3, 2003

BEFORE T	THE PUBLIC SERVICE COMMISSION STATE OF UTAH	N
In the Matter of the Investigation of the investigation of PACIFICORP and the Power Outage of December 2003))) PETITION FOR) INTERVENTION BY IBEW LOCAL 57)))) Docket No. 04-035-01))	=====

Comes now petitioner, by and through counsel, pursuant to §63-46b-9 UCA as amended and Commission's Rules of Practice R746-100-7, and hereby petitions the Commission to permit it to intervene in the above matter and represents as follows:

- 1. Petitioner, International Brotherhood of Electrical Workers, Local 57 is a labor organization representing approximately 1,634 employees of Applicant Pacificorp, in its Utah Power and Light Division. Most of these employees reside in Utah. The employees work in Applicant's power supply and delivery operations.
- 2. Employees' rights and interests may be substantially affected by this proceeding as it will affect the cost and ability of the Utility to safely and competently maintain and deliver electrical service by the efforts of its labor force. Accordingly, it is in the interests of this petitioner and the public that intervention be granted.
- 3. Petitioner has yet to determine what its position will be to the Application and evidence to be submitted in support thereof. However, Petitioner should be permitted to intervene as its interests may appear during the proceeding.
 - 4 The interests of justice and the orderly and prompt conduct of these proceedings will not be delayed, or

	6. Notices and pleading should be sent to:
	ARTHUR F. SANDACK, Esq 8 East Broadway, Ste 510 Salt Lake City, Utah 84111 Electronic filings, notices and orders should be sent by email to asandack@itower.net Facsimile copies 801-363-1715
	WHEREFORE PETITIONER prays that the Commission permits it to intervene in the above proceedings as its
interest	s appear and grant it such relief as deemed justified by the Commission.
	Dated this day of
	Arthur F. Sandack

5 Petitioner's interests are not adequately represented by any party to the proceeding.

MAILING CERTIFICATE

I hereby certify that a true and correct copy of the Petition For Intervention by IBEW Local 57 was mailed, first class, postage prepaid, on the 13th day of February, 2004 to:

Edward Hunter John Eriksson STOEL RIVES 201 South Main Street, Suite 1100 Salt Lake City, UT 84111

materially impaired or prejudiced by permitting intervention.

Michael Ginsberg Patricia Schmid Assistant Attorneys General 160 East 300 South, 5th Floor Salt Lake City, UT 84111

Reed Warnick

Assistant Attorney General 160 East 300 South, 5th Floor Salt Lake City, UT 84111

Cheryl Murray Committee of Consumer Services 160 East 300 South Suite 227 Salt Lake City, Utah 84111
