

ARTHUR F. SANDACK (#2854)
Attorney for Petitioner
8 East Broadway, Ste 510
Salt Lake City, Utah 84111
Telephone: (801) 532-7858
Fax 801-363-1715
asandack@itower.net
Attorney for Petitioner
Date Submitted: October 8, 2004

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF UTAH

=====

In the Matter of the Application of)	
PACIFICORP for Approval of its Proposed)	
Electric Service Schedules and Electric)	PETITION FOR
Service Regulations)	INTERVENTION
)	BY IBEW LOCAL 57
)	
)	
)	
)	
)	Docket No. 04-035-42
)	
)	

=====

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 Applicant to safely and competently maintain, deliver, develop, generate, and sell 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

materially impaired or prejudiced by permitting intervention.

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

6.. Notices and pleading should be sent to:

ARTHUR F. SANDACK,
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 interests appear and grant it such relief as deemed justified by the Commission.

Dated this ____ day of _____, 2004.

Arthur F. Sandack

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 8th day of October, 2004 to:

Edward A. Hunter
STOEL RIVES, LLP
201 South Main Street, Suite 1100
Salt Lake City, UT 84111

Jeff Fox
Glenn Bailey
Crossroads Urban Center
347 South 400 East
Salt Lake City, UT 84111-2968

Michael Ginsberg and Patricia Schmid
Assistant Attorney General
500 Heber M. Wells Bldg.
160 East 300 South
Salt Lake City, UT 84111

Thomas W. Forsgren

2868 Jennie Lane
Holladay, UT 84117

Reed Warnick
Assistant Attorney General
500 Heber M. Wells Bldg
160 East 300 South
Salt Lake City, UT 84111

Dale F. Gardiner, #1147
Parry Anderson & Gardiner
60 East South Temple, #1200
Salt Lake City, Utah 84111

Major Craig Paulson
Utility Litigation Team
AFLS/ULT
Tyndall AFB, FL 32403-5319

F. Robert Reeder
Vicki Baldwin
PARSONS, BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, UT 84111

Michael L. Kurtz
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

Gary Dodge
HATCH, JAMES & DODGE
10 West Broadway, Suite 4000
Salt Lake City, UT 84101

Stephen R. Randle
Randle, Deamer & Lee, P.C.
Attorneys for Utah Farm Bureau Federation
139 East South Temple, Suite 330
Salt Lake City, UT 84111-1169

Jerold G. Oldroyd
Angela W. Adams
Ballard Spahr Andrews & Ingersoll, LLP
201 South Main Street, Suite 600
Salt Lake City, Utah 84111-2221

Michael D. Woods
Comcast Cable Communications, LLC
183 Inverness Drive West, Suite 200
Englewood, Colorado 80112

J. Davidson Thomas
Genevieve D. Sapir
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Avenue, N.W. Second Floor
Washington, D.C. 20006

Gerald H. Kinghorn
Parsons Kinghorn Harris, P.C.
111 East Broadway 11th Floor
Salt Lake City, UT 84111
Peter J. Mattheis
Shaun C. Mohler
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007

Arthur F. Sandack