

January 13, 2006

**BY HAND DELIVERY**

Ms. Julie Orchard  
Utah Public Service Commission  
Heber M. Wells Building, 4th Floor  
160 East 300 South  
Salt Lake City, UT 84111

**Re: Docket No. 05-035-102 – Petition to Intervene of the Utah Industrial Energy Consumers**

Dear Ms. Orchard:

Enclosed please find the following: an original and 5 copies of the *Petition to Intervene of The Utah Industrial Energy Consumers* and a disk with an electronic version of the filing. We have also e-mailed a copy of the filing to [lmathie@utah.gov](mailto:lmathie@utah.gov).

Please do not hesitate to contact me if you have any questions.

Sincerely,

Parsons Behle & Latimer

Vicki M. Baldwin

VMB/gm  
Enclosures

F. ROBERT REEDER (2710)  
VICKI M. BALDWIN (8532)  
PARSONS BEHLE & LATIMER  
Attorneys for UIEC, an Intervention Group  
One Utah Center  
201 South Main Street, Suite 1800  
Post Office Box 45898  
Salt Lake City, UT 84145-0898  
Telephone: (801) 532-1234  
Facsimile: (801) 536-6111

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of PACIFICORP dba UTAH POWER & LIGHT COMPANY for Approval of Its Proposed Power Cost Adjustment Mechanism	DOCKET NO. 05-035-102 <b>PETITION TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS</b>
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In accordance with Rule 746-100-7 of the Public Service Commission’s Rules of Practice and Procedure and the Provisions of Utah code Ann. § 63-46b-9, Fairchild Semiconductor, Holcim, Inc., Kennecott Utah Copper Corp., Kimberly-Clark Corp., Malt-O-Meal, Praxair, Inc., and Western Zirconium (this group of electrical power customers will be referred to hereinafter for convenience only as the “Utah Industrial Energy Consumers” or “UIEC”), hereby petition the Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding.

In support of this Petition to Intervene, the UIEC state as follows:

1. PacifiCorp dba Utah Power & Light Company (“PacifiCorp”) filed an application with the Commission for approval of its proposed power cost adjustment mechanism (“PCAM”) on November 23, 2005.

2. The consumers herein referred to as UIEC are each electric power customers who each take service from PacifiCorp.

3. The consumers herein referred to as UIEC have joined together for the purposes of intervention in this docket to have their common interests represented and the interests of each of the UIEC consumers will not be adequately represented by any other party to this proceeding.

4. Each of the consumers herein referred to as UIEC have a direct, immediate, and substantial interest in this proceeding as customers of PacifiCorp because the future costs of electrical power and each UIEC member’s willingness and/or ability to continue service arrangements with PacifiCorp may be affected by a Commission decision on this Application.

5. If the UIEC are granted leave to intervene in this proceeding, the UIEC hereby request that service of all pleadings, notices, etc. be made to the following:

F. Robert Reeder  
Vicki M. Baldwin  
Parsons Behle & Latimer  
201 South Main Street, Suite 1800  
Salt Lake City, 84111  
[bobreeder@parsonsbehle.com](mailto:bobreeder@parsonsbehle.com)  
[vbaldwin@parsonsbehle.com](mailto:vbaldwin@parsonsbehle.com)

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the UIEC’s Petition to Intervene.

7. The UIEC have not yet determined the level of their participation or the precise nature of the relief the UIEC will seek, but request that the Commission grant the UIEC intervention as their interests may appear.

WHEREFORE, the UIEC request that the Commission enter an Order granting the UIEC permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this \_\_\_\_\_ day of January, 2006.

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F. ROBERT REEDER  
VICKI M. BALDWIN  
Attorneys for UIEC, an Intervention Group

## CERTIFICATE OF SERVICE

I hereby certify that on this \_\_\_\_\_ day of January, 2006, I caused to be e-mailed and/or mailed, first class, postage prepaid, a true and correct copy of the foregoing **PETITION TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS**, to:

Edward Hunter /Jennifer Horan  
STOEL RIVES LLP  
Attorneys for PacifiCorp  
201 South Main Street Suite 1100  
Salt Lake City, Utah 84111  
[jhmartin@stoel.com](mailto:jhmartin@stoel.com)  
[eahunter@stoel.com](mailto:eahunter@stoel.com)

Michael Ginsberg  
ASSISTANT ATTORNEY GENERAL  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111  
[mginsberg@utah.gov](mailto:mginsberg@utah.gov)

PacifiCorp Data Request Response Center  
825 NE Multnomah, Suite 800  
Portland, OR 97232  
[Datarequest@pacificorp.com](mailto:Datarequest@pacificorp.com)

[Barry.bell@pacificorp.com](mailto:Barry.bell@pacificorp.com)

Reid Warnick  
ASSISTANT ATTORNEY GENERAL  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111  
[rwarnick@utah.gov](mailto:rwarnick@utah.gov)

Thomas Brill  
Division of Public Utilities  
Heber M. Wells Building, 4th Floor  
160 East 300 South  
Salt Lake City, Utah 84114-6751  
[tbrill@utah.gov](mailto:tbrill@utah.gov)

Cheryl Murray  
Committee of Consumer Services  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111  
[cmurray@utah.gov](mailto:cmurray@utah.gov)

Dan Gimble  
Committee of consumer Services  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, Utah 84111  
[dgimble@utah.gov](mailto:dgimble@utah.gov)

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Gail E. Moschini  
Assistant to Vicki M. Baldwin