

ARTHUR F. SANDACK (#2854)  
Attorney for Petitioner IBEW Local 57  
8 East Broadway, Ste 510  
Salt Lake City, Utah 84111  
Telephone: (801) 532-7858

Date Submitted: August 15, 2005

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF UTAH

```

=====
                                )
In the Matter of the Application of      )  PETITION FOR
MidAmerican Energy Holdings Company      )  INTERVENTION
and PacifiCorp dba Utah Power and Light )  BY IBEW LOCAL 57
Company for an Order Authorizing Proposed )
Transaction                              )  Docket No. 05-035-54
=====

```

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 1,800 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 and are covered by the terms of collective bargaining agreements between Intervenor and Applicant PacifiCorp.

2. Intervenor and its represented employees' rights and interests may be substantially affected by this proceeding as it will affect the management, 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 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, 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](mailto: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 \_\_\_\_\_, 2005.

---

Arthur F. Sandack

#### MAILING CERTIFICATE

I hereby certify that a true and correct copy of the Petition For Intervention by IBEW Local 57 was e-mailed, on the 15<sup>th</sup> day of August, 2005 by Arthur Sandack to:

Edward A. Hunter  
Jennifer H. Martin  
Stoel Rives LLP  
201 South Main, Suite 1100  
Salt Lake City, UT 84111-4904  
[eahunter@stoel.com](mailto:eahunter@stoel.com)  
[jhmaritn@stoel.com](mailto:jhmaritn@stoel.com)

Douglas L. Anderson  
General Counsel  
Mid-American Energy Holdings Company  
302 S. 36<sup>th</sup> Street, Suite 400  
Omaha, Nebraska 68131  
[danderson@midamerican.com](mailto:danderson@midamerican.com)

Mark C. Moench  
Senior V. P Law  
Mid-American Energy Holdings Company  
201 South Main, Suite 2300

Salt Lake City, UT 84111-4904  
[mcmoench@midamerican.com](mailto:mcmoench@midamerican.com)

Andrea L. Kelly  
PacifiCorp  
825 NE Multnomah, Suite 956  
Portland, Oregon 97232  
[andrea.kelly@pacificorp.com](mailto:andrea.kelly@pacificorp.com)

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

Michael Ginsberg  
Trischa Schmid  
Asst. Attorney General  
500 Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111  
[mginsberg@utah.gov](mailto:mginsberg@utah.gov)  
[tschmid@utah.gov](mailto:tschmid@utah.gov)

Reed Warnick  
Paul Proctor  
Asst. Attorney General  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[rwarnick@utah.gov](mailto:rwarnick@utah.gov)  
[pproctor@utah.gov](mailto:pproctor@utah.gov)

Michael L. Kurtz  
BOEHM, KURTZ & LOWRY  
36 East Seventh St. Suite 2110  
Cincinnati, OH 45202  
[mkurtz@BKLlawfirm.com](mailto:mkurtz@BKLlawfirm.com)

Gary Dodge  
HATCH JAMES & DODGE  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
[gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)

Major Craig Paulson  
AFLSA/ULT  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403  
[craig.paulson@tyndall.af.mil](mailto:craig.paulson@tyndall.af.mil)

Peter J. Mattheis  
Brickfield Burcette Ritts & Stone  
800 West Tower  
1025 Thomas Jefferson Street, N.W. Washington, D.C. 20007  
[pjm@bbrslwa.com](mailto:pjm@bbrslwa.com)

F. Robert Reeder  
Parsons Behle & Latimer  
One Utah Center Ste 1800  
201 So. Main St  
SLC, UT 84111  
[BobReeder@pblutah.com](mailto:BobReeder@pblutah.com)

Thomas W. Forsgren  
2868 Jennie Lane  
Holladay, UT 84117  
[twforsgren@msn.com](mailto:twforsgren@msn.com)

Steven R. Randle  
Randle Deamer & Lee, PC  
139 East South Temple, Suite 330  
Salt Lake City, UT 84111  
[ulaw@xmission.com](mailto:ulaw@xmission.com)

Utah Rate Payers Alliance  
c/o Betsy Wolf  
764 South 200 West  
Salt Lake City, UT 84101  
[bwolf@slcap.org](mailto:bwolf@slcap.org)

Sarah Wright  
Utah Clean Energy  
917 2<sup>nd</sup> Avenue  
Salt Lake City, Utah 84103  
[swrightutah@earthlink.net](mailto:swrightutah@earthlink.net)

Lee Brown  
US Magnesium LLC  
238 North 220 West  
Salt Lake City, UT 84116  
[lbrown@usmagnesium.com](mailto:lbrown@usmagnesium.com)

---