

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

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of MIDAMERICA ENERGY HOLDING COMPANY and PACIFICORP dba UTAH POWER & LIGHT COMPANY for an order authorizing proposed transaction	DOCKET NO. 05-035-54 PETITION TO INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS
---	--

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. MidAmerica Energy Holding Company (“MidAmerica”) and PacifiCorp dba Utah Power & Light Company (“PacifiCorp”) filed an application with the Commission for approval of MidAmerica’s proposed acquisition of PacifiCorp.

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 reliability and 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
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 August, 2005.

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

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of August, 2005, 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
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

PacifiCorp Data Request Response Center
825 NE Multnomah, Suite 800
Portland, OR 97232
Datarequest@pacificorp.com

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

Andrea L. Kelly
Managing Director – Strategy
PacifiCorp
825 NE Multnomah, Suite 956
Portland, Oregon 97232
Andrea.kelly@pacificorp.com

Douglas L. Anderson
Senior Vice President & General Counsel
MidAmerican Energy Holdings Company
302 S. 36th Street, Suite 400
Omaha, Nebraska 68131
danderson@midamerican.com

Mark C. Moench
Senior Vice President – Law
MidAmerican Energy Holdings Company
201 South Main, Suite 2300
Salt Lake City, Utah 84111
mcmoench@midamerican.com

Dennis Miller
Division of Public Utilities
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
dennismiller@utah.gov

William Powell
Division of Public Utilities
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
WPowell@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

Gail E. Moschini
Assistant to Vicki M. Baldwin