

# UTAH RATEPAYERS ALLIANCE

## Salt Lake Community Action Program Crossroads Urban Center

764 South 200 West  
Salt Lake City, Utah 84101

August 22, 2005

Julie Orchard, Commission Secretary  
Public Service Commission  
160 East 300 South, 4th Floor  
Salt Lake City, Utah 84101

Re: Docket No. 05-035-54

Dear Ms. Orchard:

Enclosed is the Petition for Leave to Intervene of Salt Lake Community Action Program and Crossroads Urban Center (collectively referred to as the Utah Ratepayers Alliance) in the above-referenced docket. Please file as is your usual practice.

Thank you for your attention in this matter.

Sincerely,

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Betsy Wolf  
Utility Ratepayer Advocate  
Salt Lake Community Action Program

### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Application of )  
MidAmerican Energy Holdings Company and ) Docket No. 05-035-54  
PacifiCorp d/b/a Utah Power and Light Company for )  
an Order Authorizing Proposed Transaction )

### PETITION FOR LEAVE TO INTERVENE

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Pursuant to the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), Salt Lake Community Action Program and Crossroads Urban Center (collectively known as the Utah Ratepayers Alliance) hereby petition for leave to intervene in the above-captioned docket and, in support thereof, state as follows:

1. The Salt Lake Community Action Program (CAP) is a private nonprofit community-based organization that addresses the needs of low-income people through service delivery and advocacy.
2. Crossroads Urban Center (Crossroads) is a nonprofit community-based organization serving the needs of low-income people in the Salt Lake Metropolitan Area.
3. CAP and Crossroads have a special interest in ensuring that the people they represent receive reliable electric service at fair and reasonable rates. Any change in the corporate structure of PacifiCorp could have an impact both on the quality of service as well as the rate structure for residential electric customers of PacifiCorp. .
4. Furthermore, since Salt Lake Community Action Program and Crossroads Urban Center represent low income people, those organizations have a particular interest in ensuring that electric utility rates remain as low as possible since people with limited incomes pay such a disproportionate share of their income for electric service.
5. Accordingly, CAP and Crossroads possess a direct and substantial interest in the subject matter of this case, and seek via this intervention petition to protect that interest as it may appear. Participation in this docket will be in the public interest and may also be of particular assistance to the Commission in rendering informed decisions on the issues that will likely be raised.
6. Intervention by CAP and Crossroads will not delay the proceeding or unduly burden the other parties in the proceeding.

7. CAP and Crossroads request that all pleadings, correspondence, discovery, and other documents be served on:

Utah Ratepayers Alliance  
c/o Betsy Wolf  
Salt Lake Community Action Program  
764 South 200 West  
Salt Lake City, Utah 84101  
FAX: (801) 355-1798  
VOICE: (801) 582-2149  
E-mail [bwolf@slcap.org](mailto:bwolf@slcap.org)

8. When sending information regarding this docket electronically, we request that information also be sent to:

Bruce Plenk: [bplenk@igc.org](mailto:bplenk@igc.org)

Respectfully submitted this \_\_\_\_\_ day of August, 2005.

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Betsy Wolf, Utility Ratepayer Advocate  
Salt Lake Community Action Program

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition for Intervention in Docket No. 05-035-54, of Salt Lake Community Action Program and Crossroads Urban Center (collectively known as the Utah Ratepayers Alliance) was mailed electronically this \_\_\_\_\_ day of August, 2005, to the following:

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Respectfully,

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Betsy Wolf  
Salt Lake Community Action Program

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