

BEFORE THE PUBLIC SERVICE COMMISSION OF THE UTAH

IN THE MATTER OF THE APPLICATION OF)
MIDAMERICAN ENERGY HOLDINGS COMPANY) Docket No. 05-035-54
AND PACIFICORP DBA UTAH POWER & LIGHT)
COMPANY FOR AN ORDER AUTHORIZING)
PROPOSED TRANSACTION)

**PETITION FOR LEAVE TO INTERVENE
OF WESTERN RESOURCE ADVOCATES**

Pursuant to Rule 63-46b-9 of the Rules of Practice and Procedure of the Utah Public Service Commission (“Commission”), Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a regional environmental law and policy center serving the Rocky Mountain and Desert Southwest States. WRA’s Energy Program promotes energy efficiency, renewable resources, distributed generation, advanced power plant technologies, air pollutant emissions reductions and other measures to help minimize the environmental impacts and the costs and risks to ratepayers of meeting the demand for energy services in an economically and politically acceptable fashion. WRA has a Utah office, a Utah board member, and members who live in Utah and are PacifiCorp ratepayers. WRA has participated in Commission proceedings for over 15 years and has been granted intervenor status in multiple Commission dockets, including WRA’s intervention in Scottish Power 1999 purchase of PacifiCorp in Docket No. 98-2035-04 (WRA was Land and Water Fund of the Rockies at the time).

2. WRA has a substantial interest in the above-captioned proceeding. Notably, MidAmerican’s Application proposes multiple conditions on the acquisition, several of which

will have significant impacts on the levels of air pollutant emissions reductions and clean energy investments in Utah and the Rocky Mountain and Desert Southwest region.

3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.

WRA's petition for leave to intervene is timely filed. WRA does not currently know what evidence, if any, it would present in this proceeding.

4. WRA requests that all pleadings, correspondence, discovery and other documents be served on the following:

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WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene.

Respectfully submitted,

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