

**DEPARTMENT OF THE AIR FORCE
AIR FORCE LEGAL SERVICES AGENCY/UTILITY LITIGATION TEAM
TYNDALL AIR FORCE BASE, FLORIDA**

Capt Damund E. Williams
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139 Barnes Drive Suite 1
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March 13, 2006

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

Dear Ms. Orchard,

The Federal Executive Agencies, by and through the undersigned counsel of the Air Force Utility Litigation Team, encloses herewith an original and five copies of its Motion to Intervene in Docket 06-035-21.

Please give me a call at 850-283-6350 or e-mail me at damund.williams@tyndall.af.mil if you need additional information or need to discuss this matter.

Sincerely,

s/Damund E. Williams
DAMUND E. WILLIAMS, Capt, USAF
Utility Litigation and Negotiation Attorney for the
Federal Executive Agencies
AL Atty #ASB-9660-W54D

Lt Col Karen White
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Utility Litigation Team
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Date Submitted: March 13, 2006

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of PacifiCorp)	Docket No. 06-035-21
)	
)	
)	MOTION FOR LEAVE TO
)	INTERVENE
)	

Now comes the Federal Executive Agencies (“FEA”), by and through its counsel, Lt Col Karen White and Capt Damund Williams, and pursuant to Utah Admin. R. R746-100-7 (2000) and Utah Code Ann. § 63-46b-9, respectfully requests that the Commission grant this Motion for Leave to Intervene.

In support thereof FEA states:

1. That under Docket No.06-035-21, PacifiCorp (“PacifiCorp” or “Company”), has applied to the Utah Public Service Commission for a general increase in rates and charges for electric service on March 6, 2006.
2. That FEA operates several facilities within Utah, including Hill Air Force Base, Tooele Army Depot, Dugway Proving Grounds, and Deseret Chemical Depot. The FEA receives service at these facilities from PacifiCorp.

3. That the rates paid by FEA for electric service are likely to be affected by the outcome of this proceeding.

4. That FEA has a direct interest in the outcome of this proceeding. At this point in the process, FEA has not yet formulated what positions, if any, it will take regarding this filing.

5. Any other party cannot adequately represent the FEA's interests, due to the unique status of the Federal government.

6. That FEA has a substantial interest in this proceeding and its inclusion would promote the interests of justice.

Wherefore, FEA prays that the Commission grant it the following relief:

A. That it be granted Leave to Intervene in and become a party to this proceeding;

B. That the following be added to the service list in this proceeding:

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C. That the Commission grant such other relief as it deems appropriate.

Respectfully submitted,

FEDERAL EXECUTIVE AGENCIES

s/Damund E. Williams
Capt Damund E. Williams
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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of March, 2006, I caused to be served, via U.S. mail or email, a true and correct copy of the Motion for Leave to Intervene to the following:

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