

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: March 30, 2006

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF UTAH

=====

In the Matter of the Application of	)	
PacifiCorp for Approval of Its Proposed	)	PETITION BY
Electric Service Schedules & Electric Service	)	IBEW LOCAL 57
Regulations	)	FOR INTERVENTION
	)	
	)	
	)	Docket No. 06-035-21
	)	

=====

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 Petitioner and Applicant PacifiCorp.

2. Petitioner 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@msn.com](mailto:asandack@msn.com)  
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 30<sup>th</sup> day of March, 2006.

s/\_\_\_\_\_  
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 or mailed by first class postage on the 30<sup>th</sup> day of March, 2006 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)  
[jhmartin@stoel.com](mailto:jhmartin@stoel.com)

Michael L. Kurtz  
Kurt Boehm  
BOEHM, KURTZ & LOWRY  
36 East Seventh St. Suite 1510  
Cincinnati, OH 45202  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

Doug Larsen  
PACIFICORP  
201 South Main, Suite 2300  
Salt Lake City, Utah 84140-0023  
[Doug.larsen@pacificorp.com](mailto:Doug.larsen@pacificorp.com)

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

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

Michael Ginsberg  
Patricia 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)  
[pschmid@utah.gov](mailto:pschmid@utah.gov)

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

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)

Gerald H. Kinghorn  
Parsons Kinghorn Harris  
111 East Broadway, 11<sup>th</sup> Floor  
Salt Lake City, Utah 84111  
[ghk@pkplawyers.com](mailto:ghk@pkplawyers.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)

Dale F. Gardiner  
Parry Anderson and Gardiner  
60 East So. Temple #1200  
Salt Lake City, Utah 84111  
[dfgardiner@parrylaw.com](mailto:dfgardiner@parrylaw.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  
Bruce Plenk  
764 South 200 West  
Salt Lake City, UT 84101  
[bwolf@slcap.org](mailto:bwolf@slcap.org)  
[bplenk@igd.org](mailto:bplenk@igd.org)

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

Marco Kunz  
Salt Lake City Corporation  
Salt Lake City, Utah  
[marco.kunz@slc.gov](mailto:marco.kunz@slc.gov)

Richard Collins  
Westminister College  
1840 South 1300 East  
Salt Lake City, Utah 84105  
[rcollins@westministercollege.edu](mailto:rcollins@westministercollege.edu)

Rick Anderson  
Kevin Higgins  
Neal Townsend  
Energy Strategies  
215 South State Street, Suite 200  
Salt Lake City, Utah 84111  
[randerson@energystrat.com](mailto:randerson@energystrat.com)  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
[ntownsend@energystrat.com](mailto:ntownsend@energystrat.com)

Roger Ball  
1375 Vintry Lane  
Salt Lake City, Utah 84121  
[ball.roger@gmail.com](mailto:ball.roger@gmail.com)

Clair Geddes  
[geddes@xmission.com](mailto:geddes@xmission.com)  
3542 Honeycomb Road  
Salt Lake City, Utah 84121

James Howarth  
OO-ALC/JAN  
6026 Cedar Lane, Bldg 1278  
Hill AFB, UT 84056  
[james.howarth@hill.af.mil](mailto:james.howarth@hill.af.mil)

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

Laura Polacheck  
AARP Utah  
6975 S. Union Park Center, #320  
Midvale, UT 84047  
[lpolacheck@aarp.org](mailto:lpolacheck@aarp.org)

Ron Binz  
Public Policy Consultatn  
333 Eudora Street  
Denver CO 80220  
[rbinz@rbinz.com](mailto:rbinz@rbinz.com)

Jerold G. Oldroyd  
Angela Adams  
Ballard Spahr  
201 South Main Street  
Salt Lake City, UT 84111  
[oldroyd@ballardspahr.com](mailto:oldroyd@ballardspahr.com)  
[adamsaw@ballardspahr.com](mailto:adamsaw@ballardspahr.com)

Coralette M. Hannon  
6705 Reedy Creek Rd  
Charlotte, NC 28215  
[channon@aarp.org](mailto:channon@aarp.org)

J. Davidson Thomas  
Genevieve D. Sapir  
Cole, Raywid & Braverman  
1919 Pennsylvania Avenue, N.W.  
Second Floor  
Washington, D. C. 20006  
[dthomas@crblaw.com](mailto:dthomas@crblaw.com)  
[gsapir@crblaw.co](mailto:gsapir@crblaw.co)

Michael D. Woods  
Comcast Cable Communications, LLC  
183 Inverness Drive West, Suite 200  
Englewood, CO 80112  
[michael\\_woods@cable.comcast.com](mailto:michael_woods@cable.comcast.com)

s/\_\_\_\_\_

Arthur F. Sandack  
8 East Broadway, Ste 510  
Salt Lake City, Utah 84111  
[asandack@msn.com](mailto:asandack@msn.com)