

Roger J Ball
1375 Vintry Lane
Salt Lake City, Utah 84121
(801) 277-1375

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PacifiCorp
for Approval of its Proposed Electric Service
Schedules and Regulations

| Docket No 06-035-21
|
| REQUEST TO INTERVENE

Pursuant to the customs and practices of the Public Service Commission of Utah, including Utah Code Annotated (UCA) Section 63-46b-9 and Utah Administrative Code (UAC) R746-100-7, I respectfully request that the Commission permits me to intervene in this matter, because:

1 on 7 March 2006, PacifiCorp requested Commission approval of a general increase in its rates and charges totaling \$197M and amounting to 17.35% for residential customers like me;

2 I use electricity for lighting and other applications in my home, for which I have no choice of alternative suppliers, and am therefore a captive customer who must necessarily pay whatever rates are approved by the Commission in PacifiCorp's Tariff;

3 my legal rights and interests may therefore be substantially affected by the Commission's adjudication of this matter;

4 while the Utah Division of Public Utilities is statutorily mandated to "act in the public interest in order to provide the Public Service Commission with objective and

comprehensive information, evidence, and recommendations”, etc,¹ my legal rights and interests may or may not coincide with “the public interest”, etc;

5 while the Utah Committee of Consumer Services is statutorily mandated to “assess the impact of utility rate changes ... on residential consumers”² and “advocate ... positions most advantageous to a majority of residential consumers”, it does so “on its own behalf and in its own name ... as determined by the committee”;³

6 as an individual customer, my legal rights and interests may or may not coincide with those of “a majority of residential consumers as determined by the committee”;

7 while the Committee is also statutorily mandated to “assist residential consumers ... in appearing before” the Commission,⁴ in the past it has consistently declined to represent individual consumers, as opposed to advising them on procedures and presenting them in hearings, on the grounds that their interests might conflict with those of the majority;

8 I have not fully determined the specific positions I will take, or the relief I will seek;

9 the interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing me to intervene;

¹ Utah Code Annotated §54-4a-6.

² Utah Code Annotated §54-10-4(1).

³ Utah Code Annotated §54-10-4(3).

⁴ Utah Code Annotated §54-10-4(2).

10 indeed, the interests of justice might be materially impaired by denying me
intervention; and

11 no deadline for intervention has been set;

12 so I request leave to intervene in this proceeding to protect my interests, and
perhaps those of other PacifiCorp customers, as they may appear; and

13 request that I be added to the service list, and that copies of all notices,
pleadings, correspondence, discovery, and other documents – past and future – in this
proceeding should be sent to me:

Roger J Ball
1375 Vintry Lane
Salt Lake City, Utah 84121
(801) 277-1375
ball.roger@gmail.com

Respectfully submitted on 16 March 2006,

Roger J Ball

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request to Intervene in Docket 06-035-21 of Roger J Ball was hand delivered, sent by United States mail, postage prepaid, or mailed electronically on 16 March 2006, to the following:

Claire Geddes
geddes@xmission.com
3542 Honeycomb Road
Salt Lake City, Utah 84121
(801) 943-3654

For Utah Ratepayers Alliance

Laura Polacheck
lpolacheck@aarp.org
AARP Utah
6975 S Union Park Center, Suite 320
Midvale, Utah 84047
(801) 567-2643
(801) 561-2209 (fax)

Betsy Wolf
bwolf@slcap.org
Salt Lake Community Action Program
764 S 200 West
Salt Lake City, Utah 84101
(801) 359-2444 ext 223
(801) 355-1798 (fax)

Coralette M Hannon
channon@aarp.org
6705 Reedy Creek Road
Charlotte, North Carolina 28215
(704) 545-6187

For AARP

Dale F Gardiner
dfgardiner@parrylaw.com
Parry, Anderson & Gardiner PC
60 E South Temple, Suite 1200
Salt Lake City, Utah 84111
(801) 521-3434
(801) 521-3484 (fax)

Attorney for AARP

Thomas W Forsgren
twforsgren@msn.com
2868 Jennie Lane
Holladay, Utah 84117
(801) 272-2287

Attorney for AARP

Leslie Reberg, Director
(801) 530-6644
lreberg@utah.gov
Dan Gimble
(801) 530-6798
dgimble@utah.gov
Cheryl Murray
(801) 530-6957
cmurray@utah.gov
Utah Committee of Consumer Services
Heber M Wells Building, 2nd Floor
160 E 300 South
Salt Lake City, Utah 84111
(801) 530-7655 (fax)

Reed T. Warnick (3391)
(801) 366-0327
rwarnick@utah.gov
Paul Proctor (2657)
(801) 366-0552
pproctor@utah.gov
Assistant Attorneys General
Heber M Wells Building, 5th Floor
160 East 300 South
Salt Lake City, Utah 84111
(801) 366-0352 (fax)

*Attorneys for the Utah Committee of
Consumer Services*

Gary A. Dodge (0897)
(801) 363-6363
gdodge@hjdllaw.com
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
(801) 363-6666 (fax)

Attorney for UAE Intervention Group

Rick Anderson
randerson@energystrat.com
Kevin Higgins
khiggins@energystrat.com
Energy Strategies
215 S State Street, Suite 200
Salt Lake City, UT 84111
(801) 355-4365
(801) 521-9142 (fax)

For UAE Intervention Group

F Robert Reeder
bobreeder@pblutah.com
Vicki Baldwin
vbaldwin@pblutah.com
Parsons, Behle & Latimer
201 S Main Street, Suite 1800
Salt Lake City, Utah 84111
(801) 532-1234
(801) 536-6111 (fax)

Attorneys for UIEC

Constance White, Director
(801) 530-6659
cbwhite@utah.gov
William Powell
(801) 530-6032
wpowell@utah.gov
Dennis Miller
(801) 530-6657
dennismiller@utah.gov
Utah Division of Public Utilities
Heber M Wells Building, 4th Floor
160 E 300 South
Salt Lake City, Utah 84111
(801) 530-6512 (fax)

Michael Ginsberg (4516)
(801) 366-0353
mginsberg@utah.gov
Patricia E Schmid (4908)
(801) 366-0380
pschmid@utah.gov
Assistant Attorneys General
Heber M Wells Building, 5th Floor
160 East 300 South
Salt Lake City, Utah 84111
(801) 366-0352 (fax)

Attorneys for the Utah Division of Public Utilities

Jeff Larsen
jeff.larsen@pacificorp.com
Dave Taylor
dave.taylor@pacificorp.com
PacifiCorp
201 S Main Street, Suite 2300
Salt Lake City, Utah 84111-2300
(801) 220-4907
(801) 220-3116 (fax)

Data Request Response Center
datarequest@pacificorp.com
PacifiCorp
825 NE Multnomah, Suite 800
Portland, Oregon 97232
(503) 813-6060 (fax)

Edward A Hunter
eahunter@stoel.com
Jennifer H Martin
jhmartin@stoel.com
Stoel Rives LLP
201 S Main Street
Salt Lake City, Utah 84111-4904
(801) 578-6936
(801) 578-6999 (fax)

Attorneys for PacifiCorp

Roger J Ball