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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Complaint of Rocky Mountain Power, a Division of PacifiCorp, Against Heber Light & Power Regarding Unauthorized Service by Heber Light & Power in Areas Certificated to Rocky Mountain Power

DOCKET NO. 07-035-22
PETITION TO INTERVENE OF TOWN OF INDEPENDENCE

The Town of Independence (Independence), pursuant to Utah Code Annotated § 63-46b-9 and Utah Administrative Code R746-100-7, petitions the Commission to grant it intervention in this docket. The grounds for this petition are as follows:

1. Independence has rights and interests that may be substantially affected by this proceeding. Independence is a town and a political subdivision of the state of Utah located in Wasatch County. Independence has an interest in the issue of whether electric service to the town and its residents will be provided by Rocky Mountain Power or Heber Light & Power Company.
2. Independence has not yet fully determined the position it will take in this proceeding. After reviewing the testimony to be filed by Rocky Mountain Power and Heber Light & Power Company, Independence will be better able to determine its position.
3. Granting Independence intervention will not interfere with the interests of justice

and the orderly and prompt conduct of this proceeding. The Scheduling Order issued by the Commission in this matter on November 3, 2008, set December 18, 2008 as the deadline for interested parties to petition for intervention. This petition is filed by that deadline.

For the foregoing reasons, Independence respectfully requests that the Commission enter an order granting it intervention in this proceeding.

DATED: December 14, 2008.

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Jodi S. Hoffman
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PETITION TO INTERVENE OF TOWN OF INDEPENDENCE was served upon the following at the email addresses indicated below on December 16, 2008:

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