

F. ROBERT REEDER (2710)
WILLIAM J. EVANS (5276)
VICKI M. BALDWIN (8532)
PARSONS BEHLE & LATIMER
One Utah Center
201 South Main Street, Suite 1800
Post Office Box 45898
Salt Lake City, UT 84145-0898
Telephone: (801) 532-1234
Facsimile: (801) 536-6111
Attorneys for UIEC, an Intervention Group

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Docket No. 08-035-38

**PETITION TO INTERVENE OF
THE UTAH INDUSTRIAL
ENERGY CONSUMERS**

In accordance with Rule 746-100-7 of the Public Service Commission’s Rules of Practice and Procedure and the Provisions of Utah Code Ann. § 63-46b-9, Fairchild Semiconductor, Holcim, Inc., Kennecott Utah Copper Corp., Kimberly-Clark Corp., Malt-O-Meal, Praxair, Inc., Proctor & Gamble, Inc., Tesoro Refining and Marketing Co., and Western Zirconium (this group of electrical power customers will be referred to hereinafter for convenience only as the “Utah Industrial Energy Consumers” or “UIEC”), hereby petition the Public Service Commission (“Commission”) for leave to intervene in the above-referenced proceeding.

In support of this Petition to Intervene, the UIEC state as follows:

1. On July 17, 2008, PacifiCorp (d.b.a. Rocky Mountain Power Company) (“Rocky Mountain”) filed an Application with the Commission to increase its electric service rates in

Utah and for approval of its proposed Electric Service Schedules and Electric Service Regulations.

2. The consumers herein referred to as UIEC are a group of consumers who each take service from Rocky Mountain.

3. The consumers herein referred to as UIEC have joined together for the purposes of intervention in this docket to have their common interests represented and the interests of each of the UIEC consumers will not be adequately represented by any other party to this proceeding.

4. The consumers herein referred to as UIEC have a direct, immediate, and substantial interest in this proceeding as customers of Rocky Mountain because the availability of electrical power, and the rate they pay for electric service may be affected by a Commission decision on Rocky Mountain's Application.

5. If the consumers herein referred to as UIEC are granted leave to intervene in this proceeding, they hereby request that service of all pleadings, notices, etc. be made to the following:

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
bobreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of the UIEC's Petition to Intervene.

7. The consumers herein referred to as the UIEC have not yet determined the level of their participation or the precise nature of the relief the UIEC will seek, but request that the Commission grant the UIEC intervention as their interests may appear.

WHEREFORE, the UIEC request that the Commission enter an Order granting the consumers herein referred to as the UIEC permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 28th day of July, 2008.

/s/ F. Robert Reeder

F. ROBERT REEDER

WILLIAM J. EVANS

VICKI M. BALDWIN

PARSONS BEHLE & LATIMER

Attorneys for UIEC, an Intervention Group

CERTIFICATE OF SERVICE

(Docket No. 08-035-38)

I hereby certify that on this 28th day of July 2008, I caused to be e-mailed, a true and correct copy of the foregoing PETITION OT INTERVENE OF THE UTAH INDUSTRIAL ENERGY CONSUMERS to:

Michael Ginsberg
Patricia Schmidt
ASSISTANT ATTORNEYS
GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov

Dean Brockbank
Daniel Solander
Jeff Larsen
Mark Moench
Senior Counsel
ROCKY MOUNTAIN POWER
201 South Main Street, Suite
2300
Salt Lake City, UT 84111
dean.brockbank@pacificorp.com
Daniel.solander@pacificorp.com
jeff.larsen@pacificorp.com
Mark.moench@pacificorp.com
datarequest@pacificorp.com

Paul Proctor
ASSISTANT ATTORNEYS
GENERAL
500 Heber Wells Building
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Michele Beck
Executive Director
COMMITTEE OF CONSUMER
SERVICES
500 Heber Wells Building
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
mbeck@utah.gov

Rick Anderson
Neal Townsend
ENERGY STRATEGIES
215 South State Street, Suite
200
Salt Lake City, UT 84111
randerson@energystrat.com
ntownsend@energystrat.com

Gary Dodge
HATCH JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com

David L. Taylor
Manager – Utah Regulatory
Affairs
ROCKY MOUNTAIN POWER
201 South Main St., Suite
2300
Salt Lake City, UT 84111
Dave.Taylor@PacifiCorp.com

William Powell
Phil Powlick
Dennis Miller
DIVISION OF PUBLIC
UTILITIES
500 Heber Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
wpowell@utah.gov
dennismiller@utah.gov
Philippowlick@utah.gov

Arthur F. Sandack
8 East Broadway, Ste 510
Salt Lake City, Utah 84111
Telephone: (801) 532-
7858
asandack@msn.com

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

Roger Swenson
US MAGNESIUM LLC
238 North 2200 West
Salt Lake City, Utah
84116
Roger.swenson@prodigy.net

Gerald H. Kinghorn
Jeremy R. Cook
PARSONS KINGHORN HARRIS,
P.C.
111 East Broadway, 11th
Floor
Salt Lake City, UT 84111
ghk@pkhlawyers.com
jrc@pkhlawyers.com

Peter J. Mattheis
Eric J. Lacey
BRICKFIELD, BURCHETTE,
RITTS & STONE, P.C.
1025 Thomas Jefferson
Street, N.W.
800 West Tower
Washington, D.C. 20007
Pjm@bbrslaw.com
elacey@bbrslaw.com

Michael L. Kurtz
Kurt J. Boehm
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite
1510
Cincinnati, Ohio 45202
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com

Ronald J. Day, CPA
CENTRAL VALLEY WATER
RECLAMATION FACILITY
800 West Central Valley
Road
Salt Lake City, UT 84119
dayr@cvwrf.org

Sarah Wright
UTAH CLEAN ENERGY
917 – 2nd Ave.
Salt Lake City, UT 84103
sarah@utahcleanenergy.org

Cheryl Murray
Dan Gimble
UTAH COMMITTEE OF
CONSUMER SERVICES
160 East 300 South, 2nd
Floor
Salt Lake City, UT 84111
cmurray@utah.gov
dgimble@utah.gov

Mike Mendelsohn
WESTERN RESOURCES
ADVOCATES
2260 Baseline Rd., Suite 200
Boulder, CO 80302
mmendelsohn@westernresou
rces.org

Steve Michel
WESTERN RESOURCES
ADVOCATES
2025 Senda de Andres
Santa Fe, NM 87501
smichel@westernresources
.org

Utah Ratepayers Alliance
c/o Betsy Wolf
SALT LAKE COMMUNITY
ACTION PROGRAM
764 South 200 West
Salt Lake City, UT 84101
bwolf@slcap.org

Laura Polacheck
Dale F. Gardiner
Janee Briesemeister
AARP UTAH
6975 So. Union Park
Center, #320
Midvale, UT 84047
lpolacheck@aarp.org
dgardiner@vancott.com
jbriesemeister@aarp.org

Stephen F. Mecham
CALLISTER NEBEKER &
MCCULLOUGH
10 East South Temple, Suite
900
Salt Lake City, UT 84133
sfmecham@cnmlaw.com

Craig Cox
Executive Director
INTERWEST ENERGY
ALLIANCE
P. O. Box 272
Confier, Colorado 80433
cox@interwest.org

Stephen R. Randle
UTAH FARM BUREAU
FEDERATION
664 No. Liston Circle

Kaysville, Utah 84037
sr_@yahoo.com
Holly Rachel Smith, Esq.
Russell W. Ray, PLLC
6212-A Old Franconia
Road
Alexandria, VA 22310
holly@raysmithlaw.com

Mr. Ryan L. Kelly
Kelly & Bramwell, PC
Attorneys at Law
11576 South State Street,
Bldg. 203
Draper, UT 84020
ryan@kellybramwell.com

Steve W. Chriss
Wal-Mart Stores, Inc.
2001 SE 10th Street
Bentonville, AR 72716-
0550
Stephen.chriss@wal-
mart.com

Penny Anderson
Energy Program Assistant
Western Resource Advocates
2260 Baseline Rd., Suite 200
Boulder, CO 80302-7740
penny@westernresources.org

Katherine A. McDowell
Lisa F. Rackner
McDowell & Rackner P.C.
520 SW 6th Avenue, Suite
830
Portland, OR 97204
katherine@mcd-law.com
lisa@mcd-law.com

/s/ Rebecca Seat
