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Attorneys for Rocky Mountain Power

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of  
ROCKY MOUNTAIN POWER for Approval  
of a Standard Reciprocal Pole Attachment  
Agreement

DOCKET No. 10-035-\_\_\_\_

**MOTION OF ROCKY MOUNTAIN  
POWER TO CONSOLIDATE  
WITH DOCKET NO. 10-035-43**

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PacifiCorp, doing business in Utah as Rocky Mountain Power (“Rocky Mountain Power” or “Company”) respectfully moves the Commission to issue an Order consolidating this Docket into Docket No. 10-035-43. In support of its Motion, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a public utility in the state of Utah and is subject to the jurisdiction of the Commission with regard to its rates and service. As a public utility that permits attachments to its poles by an attaching entity, Rocky Mountain Power is obligated to provide that service pursuant to the requirements in Utah Admin. Rules, R.746-345 governing pole attachments. Pursuant to the Commission’s August 3, 2010 Amended Scheduling Order in Docket No. 10-035-43, (the “Scheduling Order”) Rocky Mountain Power filed on this day for Commission approval a proposed standard reciprocal pole attachment agreement. In the Scheduling Order, the Commission ordered the Company to file a motion to consolidate this Docket into Docket No. 10-035-43.

2. Communications regarding this Motion should be addressed to:

By e-mail (preferred): Barbara.ishimatsu@pacificorp.com

By mail: Barbara Ishimatsu  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111  
Telephone: (801) 220-4640

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission issue an order consolidating this Docket into Docket No. 10-035-43.

DATED this 31<sup>st</sup> day of August, 2010.

Respectfully submitted,

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Daniel Solander  
Barbara Ishimatsu  
Yvonne Hogle  
Rocky Mountain Power

*Attorneys for Rocky Mountain Power*

## CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **MOTION TO CONSOLIDATE** to be served upon the following by electronic mail or U.S. mail, postage prepaid, to the addresses shown below on August 31, 2010:

<p>Linda Wallace Utility Administration Manager NextG Networks, Inc. 2216 O'Toole Avenue San Jose, CA 95131 <a href="mailto:lwallace@nextgnetworks.net">lwallace@nextgnetworks.net</a></p>	<p>Jerold G. Oldroyd, Esq. Sharon M. Bertelsen, Esq. Theresa A Foxley, Esp Ballard Spahr LLP 201 South Main Street, Suite 800 Salt Lake City, Utah 84111-2221 <a href="mailto:oldroydj@ballardspahr.com">oldroydj@ballardspahr.com</a> <a href="mailto:bertelsens@ballardspahr.com">bertelsens@ballardspahr.com</a> <a href="mailto:foxleyt@ballardspahr.com">foxleyt@ballardspahr.com</a></p>
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<p>Michael Ginsberg Patricia Schmid Assistant Attorney General Utah Division of Public Utilities Heber M. Wells Bldg., Fifth Floor 160 East 300 South Salt Lake City, UT 84111 <a href="mailto:mginsberg@utah.gov">mginsberg@utah.gov</a> <a href="mailto:pschmid@utah.gov">pschmid@utah.gov</a></p>	<p>Dennis Miller William Powell Philip Powlick Division of Public Utilities Heber M. Wells Building 160 East 300 South, 4<sup>th</sup> Floor Salt Lake City, UT 84111 <a href="mailto:dennismiller@utah.gov">dennismiller@utah.gov</a> <a href="mailto:wpowell@utah.gov">wpowell@utah.gov</a> <a href="mailto:philippowlick@utah.gov">philippowlick@utah.gov</a></p>
<p>Stephen F. Mecham Callister Nebeker &amp; McCullough 10 East South Temple, Suite 900 Salt Lake City, Utah, 84133 Telephone: 801 530-7300 Email: <a href="mailto:sfmecham@cnmlaw.com">sfmecham@cnmlaw.com</a></p>	<p>Curt Huttzell, Ph.D. FRONTIER COMMUNICATIONS CORPORATION 1387 West 2250 South Woods Cross, Utah 84087 Telephone: (801) 298-0757 Facsimile: (801) 298-0758</p>

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