

Norman G. Curtright
Associate General Counsel, Qwest
20 E. Thomas Road, 16th Floor
Telephone: (602) 630-2187
Facsimile: (303) 383-8484
norm.curtright@qwest.com

Attorney for Qwest Corporation

BEFORE THE UTAH PUBLIC SERVICE COMMISSION

In the Matter of the Application of ROCKY MOUNTAIN POWER for Approval of a Standard Non-Reciprocal Pole Attachment Agreement	DOCKET NO. 10-035-43
In the Matter of the Application of ROCKY MOUNTAIN POWER for Approval of a Standard Reciprocal Pole Attachment Agreement	DOCKET NO. 10-035-____ QWEST CORPORATION'S PETITION TO INTERVENE

Pursuant to the Utah Admin. Codes § R476-100-7 and § 63-46b-9, and Utah Code Ann. § 63G-4-207, QWEST CORPORATION (hereinafter "Qwest"), respectfully, petitions that the Utah Public Service Commission, hereby moves for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah. As grounds for such intervention, Qwest states that it has legal rights or interests that are or may be substantially affected by these proceedings; that there are facts which support this position detailed below; and that Qwest requests that it be allowed intervention and discovery to determine if its rights or interests are or may be jeopardized by approval petition filed by Rocky Mountain Power. In support of this Motion, Qwest states as follows:

1. Rocky Mountain Power requested an order under Utah Admin. Code R746-345-3 approving a standard form Non-Reciprocal Pole Attachment Agreement (the "Agreement"), to be utilized between Rocky Mountain Power and cable and/or telecommunications companies desiring to attach facilities to the Rocky Mountain

Power's distribution poles on or about April 26, 2010. On or about August 31, 2010 Rocky Mountain Power filed an application with the Utah Public Service Commission for approval of a Standard Reciprocal Pole Attachment Agreement. They also filed a motion to consolidate both the Non-Reciprocal and Reciprocal Pole Attachment Agreement proceedings.

2. Qwest is a competitive local carrier certified by the Public Service Commission of Utah to provide telecommunications services in the State of Utah.

3. Qwest has thousands of pole attachments with Rocky Mountain Power in the State of Utah.

4. Qwest's customers in Utah may be impacted by Qwest's ability to attach to Rocky Mountain Power's poles upon just and reasonable rates, terms, and conditions.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Qwest to intervene.

6. The name, address, and telephone number of the person to whom communications should be addressed is:

Norman G. Curtright
Associate General Counsel
QWEST CORPORATION
Legal Department
20 East Thomas Road, 16th Floor
Phoenix, Arizona 85012
Voice: (602) 630-2187
Fax: (303) 383-8484
Email: norm.curtright@qwest.com

WHEREFORE, for the reasons set forth above, Qwest requests that the Public Service Commission of Utah grant this timely Motion to Intervene and permit Qwest to participate in this proceeding to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 9th day of September, 2010.

QWEST CORPORATION

By: /s/ Norman G. Curtright
Norman G. Curtright
Associate General Counsel, Qwest
20 E. Thomas Rd., 16th Floor
Phoenix, Arizona 8501
Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on the 9th of September, 2010, I served a true and correct copy of the foregoing **QWEST CORPORATION'S MOTION TO INTERVENE** to the following persons via *hand-delivery, electronic mail or U.S. Mail postage prepaid to the addresses shown below:

<p>Linda Wallace Utility Administration Manager NextG Networks, Inc. 2216 O'Toole Avenue San Jose, CA 95131 lw Wallace@nextgnetworks.net</p>	<p>Jerold G. Oldroyd, Esq. Sharon M. Bertelsen, Esq. Theresa A Foxley, Esq. Ballard Spahr LLP 201 South Main Street, Suite 800 Salt Lake City, Utah 84111-2221 oldroydj@ballardspahr.com bertelsens@ballardspahr.com foxleyt@ballardspahr.com</p>
<p>*Cheryl Murray Dan Gimble Michele Beck Office of Consumer Services 160 East 300 South, 2nd Floor Salt Lake City, UT 84111 cmurray@utah.gov dgimble@utah.gov mbeck@utah.gov</p>	<p>*Paul Proctor Office of Consumer Services Heber M. Wells Bldg., Fifth Floor 160 East 300 South Salt Lake City, UT 84111 pproctor@utah.gov</p>
<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 mginberg@utah.gov pschmid@utah.gov</p>	<p>*Dennis Miller William Powell Philip Powlick Division of Public Utilities Heber M. Wells Building 160 East 300 South, 4th Floor Salt Lake City, UT 84111 dennismiller@utah.gov wpowell@utah.gov philippowlick@utah.gov</p>

<p>Stephen F. Mecham Callister Nebeker & McCullough 10 East South Temple, Suite 900 Salt Lake City, Utah, 84133 Telephone: 801 530-7300 Email: sfmecham@cnmlaw.com</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 Email: Curt.Huttzell@frontiercorp.com</p>
<p>Natasha Ernst NextG Networks of California, Inc. 2216 O'Toole Ave San Jose, CA 95131 nernst@nextgnetworks.net</p>	<p>Cathy Murray Manager, Regulatory Affairs Department of Law & Policy Integra Telecom 6160 Golden Hills Drive Golden Valley, MN 55416 Voice: (763) 745-8466 Fax: (763) 745-8459 catherine.murray@integratelecom.com</p>
<p>Bill Shaw Bajabb Broadband wshaw@bajabb.tv</p>	<p>Daniel E. Solander (11467) Barbara Ishimatsu (10945) Yvonne R. Hogle (07550) Rocky Mountain Power 201 South Main Street, Suite 2300 Salt Lake City, Utah 84111 Telephone No. (801) 220-4640 Facsimile No. (801) 220-3299 barbara.ishimatsu@pacificorp.com</p>
<p>Data Request Response Center Rocky Mountain Power 825 NE Multnomah St., Suite 800 Portland, OR 97232 datarequest@pacificorp.com</p>	<p>Dave Taylor Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, UT 84111 Telephone: (801) 220-2923 dave.taylor@pacificorp.com</p>
<p>Julie P. Orchard Commission Administrator Utah Public Service Commission Heber M. Wells Building, 4th Floor 160 East 300 South Salt Lake City, UT 84111 ORIGINAL & 5 COPIES <i>via hand-delivery</i></p>	

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/s/ Brenda S. Studebaker