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UTAH PUBLIC
SERVICE COMMISSION

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

* * * * *


In the Matter of the)	
Application of UTAH POWER)	RESPONSE OF UMWA
& LIGHT COMPANY and PC/UP&L)	DISTRICT 22 TO
MERGING CORP. (to be renamed)	PROPOSED LIST OF
PACIFICORP) for an Order)	STIPULATED FACTS, AND
Authorizing the Merger of)	ISSUES AND FACTS IN
UTAH POWER & LIGHT COMPANY)	DISPUTE
and PACIFICORP into PC/UP&L)	
MERGING CORP. Authorizing the)	
Issuance of Securities, Adoption)	Case No. 87-035-27
of Tariffs and Transfer of)	
Certificates of Public Conven-)	
ience and Necessity and)	
Authorities in Connection)	
Therewith.)	

* * * * *

UMWA District 22 hereby responds to "the proposed list of stipulated facts".

Since March 4, 1988, UMWA District 22 has made good faith attempts to settle certain issues of fact with counsel for the Applicant relative to issues raised by Intervenor. It would unfairly burden Intervenor to respond to totality of Utah Shareholder Association proposals on matters not germane to Intervenor's interest.

DATED this 15 day of April, 1988.


 A. WALLY SANDACK
 Attorney for Intervenor
 UMWA District 22

CERTIFICATE OF MAILING

I hereby certify that on April 15, 1988 I served a copy of the foregoing document on those persons listed on the official service list in this proceeding, by depositing a copy thereof in the United States mail, postage prepaid, or by equivalent method of service.

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A handwritten signature in cursive script that reads "Dan Robinson". The signature is written in black ink and is positioned above a horizontal line.