

file

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

87-035-27

IN THE MATTER OF THE APPLICATION)
 OF UTAH POWER & LIGHT COMPANY,)
 PACIFICORP dba PACIFIC POWER &)
 LIGHT COMPANY, AND PC/UP&L)
 MERGING CORP. (TO BE RENAMED)
 PACIFICORP) FOR AN ORDER)
 AUTHORIZING THE MERGER OF UTAH)
 POWER & LIGHT COMPANY AND)
 PACIFICORP INTO PC/UP&L MERGING)
 CORP. AND AUTHORIZING THE)
 ISSUANCE OF SECURITIES, ADOPTION)
 OF TARIFFS, AND TRANSFER OF)
 CERTIFICATES OF PUBLIC)
 CONVENIENCE AND NECESSITY AND)
 AUTHORITIES IN CONNECTION)
 THEREWITH.)

NOTICE OF
 INTERVENTION OF
 UTAH ASSOCIATED
 MUNICIPAL POWER
 SYSTEMS AND
 WASHINGTON CITY

Case No. 87-035-27

Pursuant to Rule R750-100-6 of the Public Service Commission, the Utah Associated Municipal Power Systems ("UAMPS") and Washington City ("Washington") hereby give notice of their intent to intervene in the captioned matter. In support of this notice, UAMPS and Washington state:

1. UAMPS is an association of municipal power systems in the State of Utah situated within the Utah Power & Light Company ("UP&L") control area and interconnected with UP&L's transmission system.

2. Washington is a municipality of the State of Utah in Washington County which is purchasing from UP&L the electric

distribution system and associated equipment within its city limits pursuant to an agreement of purchase and sale between Washington and UP&L.

3. A major function of UAMPS is to secure economic and reliable electric power resources for its members.

4. The electric power resources used by UAMPS' members consist primarily of electricity generated by federal facilities in the Colorado River Storage Project and by UP&L's Hunter II Generating Station.

5. The power is transmitted to UAMPS' members over UP&L's electric transmission system.

6. UAMPS is engaged in continuing efforts to secure transmission access for its members to take advantage of the most economic power resources available.

7. Washington is engaged in continuing efforts to secure transmission access to take advantage of the most economic power resources available and has an affirmative commitment from UP&L to provide transmission access.

8. The Commission's letter of August 6, 1987 to Mr. Frank Davis, President of UP&L, identifies "Transmission access for other entities" as one of the issues the Commission will examine in the instant proceeding.

9. The Commission's letter of September 15, 1987 to UP&L identifies a number of issues to be considered in the

instant proceeding under the general heading of "Transmission", including "Existing Interests with Other Utilities," "Wheeling Sales & Revenue Opportunities--Separate & Merged," "Wheeling Policy--Merged," and "Wheeling Prices--If Merged--Levels and Methods of Establishment."

10. The merger of UP&L and Pacificorp will bring under the control of a single private utility the transmission systems of seven western states, thereby affecting the ability of UAMPS and Washington to obtain transmission access.

11. The merger is likely to cause significant changes in both wholesale and retail power rates, which will directly affect UAMPS, its members, and Washington.

UAMPS and Washington seek the following relief:

1. UAMPS and Washington seek to preserve reasonable access to transmission by third parties if the merger is approved by the Commission.

2. UAMPS and Washington seek to insure that the merged corporation will honor all existing commitments for wheeling and transmission access.

3. UAMPS and Washington reserve the right to seek other affirmative relief if it becomes necessary to do so to protect their respective interests.

DATED this 13th day of October, 1987.

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the within and foregoing Notice of Intervention by Utah Associated Municipal Power Systems and the City of Washington to be delivered this 13th day of October, 1987 to the following:

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