

'88 FEB 29 P 4:17

VAN COTT, BAGLEY, CORNWALL & McCARTHY
James A. Holtkamp
David L. Deisley
50 South Main, Suite 1600
P. O. Box 45340
Salt Lake City, Utah 84145
Telephone: (801) 532-3333

SERVICE COMMISSION

Attorneys for Utah Associated Municipal
Power Systems

SNOW, NUFFER, ENGSTROM & DRAKE
Chris L. Engstrom
90 East 200 North
St. George, Utah 84770

Attorneys for Washington City

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of UTAH 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., Authorizing the Issuance of Securities, Adoption of Tariffs and Transfer of Certificates of Public Convenience and Necessity and Authorities in Connection Therewith.

POSITION OF UTAH ASSOCIATED MUNICIPAL POWER SYSTEMS ON CEDAR CITY MOTION FOR REVIEW OF GROUPING

Case No. 87-035-27

Utah Associated Municipal Power Systems, intervenor in the captioned matter, hereby submits this statement of its position in response to the Motion for Review of Grouping filed by Cedar City in the captioned matter.

Cedar City has moved the Commission to group Cedar City with the group entitled "wholesale customers," which consist of UAMPS, Washington City, and Deseret Generation and Transmission Co-operative.

UAMPS has no objection to the grouping of Cedar City with this group, subject to the condition that should the interest of UAMPS and Washington City diverge from any or all of those of Cedar City, UAMPS will not be bound by any position taken by Cedar City and may pursue those interests separately.

DATED this 29th day of February, 1988.

James A. Holtkamp
VAN COTT, BAGLEY, CORNWALL & McCARTHY

By James Holtkamp
Attorneys for Utah Associated
Municipal Power Systems

Chris L. Engstrom
SNOW, NUFFER, ENGSTROM & DRAKE

By Chris Engstrom (SN)
Attorneys for Washington City

CERTIFICATE OF MAILING

I hereby certify that I caused a true and correct copy of the within and foregoing Position of Utah Associated Municipal Power Systems on Cedar City Motion for Review of Grouping to be mailed, postage prepaid, this 29th day of February, 1988 to the following:

Sidney G. Baucom, Esq.
Thomas W. Forsgren, Esq.
Edward A. Hunter, Jr., Esq.
Utah Power & Light Company
1407 West North Temple
Salt Lake City, Utah 84116

Dale A. Kimball, Esq.
Gary A. Dodge, Esq.
Kimball, Parr, Crockett
& Waddoups
P. O. Box 11019
Salt Lake City, Utah 84147

F. Robert Reeder, Esq.
Val R. Antczak, Esq.
Parsons, Behle & Latimer
P. O. Box 11898
Salt Lake City, Utah 84147

Donald B. Holbrook, Esq.
Calvin L. Rampton, Esq.
Ronald J. Ockey, Esq.
L. R. Curtis, Jr., Esq.
Jones, Waldo, Holbrook &
McDonough
1500 First Interstate Plaza
Salt Lake City, Utah 84101

Raymond W. Gee, Esq.
Kirton, McConkie & Bushnell
330 South 300 East
Salt Lake City, Utah 84111

George M. Galloway, Esq.
Stoel, Rives, Boley, Jones
& Grey
900 S.W. Fifth Ave., Ste. 2300
Portland, Oregon 97204

Donald R. Allen, Esq.
John P. Williams, Esq.
Duncan, Allen & Mitchell
1575 Eye Street, N.W.
Washington, D.C. 20005

Robert S. Campbell, Jr., Esq.
Gregory B. Monson, Esq.
Watkiss & Campbell
310 South Main, Suite 1200
Salt Lake City, Utah 84101

Richard W. Giauque, Esq.
Gregory P. Williams, Esq.
Gary F. Bendinger, Esq.
Giauque, Williams, Wilcox
& Bendinger
500 Kearns Building
Salt Lake City, Utah 84101

A. Wally Sandack, Esq.
370 East Fifth South
Salt Lake City, Utah 84111

John Morris, Esq.
LeBoeuf, Lamb, Leiby & MacRae
136 South Main, Suite 1000
Salt Lake City, Utah 84101

Michael Ginsberg, Esq.
Assistant Attorney General
130 State Capitol Building
Salt Lake City, Utah 84114

F. Elgin Ward, Esq.
Lynn W. Mitton, Esq.
Deseret Generation &
Transmission
8722 South 300 West
Sandy, Utah 84070

Salli Barash, Esq.
Wilkie, Farr & Gallagher
1 Citi Corp Center
153 East 53rd Street
New York, New York 10022

Roger Cutler, Esq.
Salt Lake City Attorney
324 South State Street
Salt Lake City, Utah 84111

Alice Ritter Burns, Esq.
Cedar City Corporation
P. O. Box 249
Cedar City, Utah 84720

Kathryn T. Whalen, Esq.
Bennett, Hartman, Tauman
& Reynolds
One S.W. Columbia, Suite 1450
Portland, Oregon 97258

Utah Energy Office
3 Triad Center, #450
Salt Lake City, Utah 84180

Robert Wall, Esq.
2470 South Redwood Road
West Valley City, Utah 84119

Sandy Mooy, Esq.
Assistant Attorney General
124 State Capitol Building
Salt Lake City, Utah 84114

L. Christian Hauck, Esq.
P. O. Box 1149
Montrose, Colorado 81402

Michael S. Gilmore, Esq.
Idaho Public Utility Commission
Deputy Attorney General
State House Mail
Boise, Idaho 83720

Stephen R. Randle, Esq.
Ungricht, Randle & Deamer
520 Boston Building
Salt Lake City, Utah 84111

Glen J. Ellis, Esq.
Dean B. Ellis, Esq.
60 East 100 South, Suite 102
Provo, Utah 84603

Charles M. Darling, IV, Esq.
Baker & Botts
555 13th Street, N.W.
Suite 500 East
Washington, D.C. 20004-1109

Gerald D. Conder, Esq.
Conder & Wangsgard
4059 South 4000 West
West Valley City, Utah 84120

Mr. Jay Bowcutt, Controller
Nucor Steel/Utah Division
P. O. Box 488
Plymouth, Utah 84330

James Hobbins

9167H