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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

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In the Matter of the Application)
of)
UTAH POWER & LIGHT COMPANY and)
PU/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)
Certificates of Public Convenience)
and Necessity and Authorities in)
Connection Therewith.)

Case No. 87-035-27

PETITION TO INTERVENE
OF LOCAL 125, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO

Pursuant to the provisions of Rule R750-100-4 of the Rules of Practice of the Utah Public Service Commission, Local 125, International Brotherhood of Electrical Workers, AFL-CIO ("Local 125") petitions the Commission for leave to intervene in the above referenced case. The grounds for such intervention are more particularly set forth as follows:

1. Local 125 is a labor organization representing approximately 3,450 employees in the northwest. Local 125 represents approximately 658 employees at Pacific Power & Light Company.

2. Local 125 has an interest in these proceedings because the outcome of these proceedings may have an impact on rate payers in general which, in turn, may affect the wages, hours, and working conditions of employees Local 125 represents who currently work for Pacific Power & Light Company. In addition, many of the members Local 125 represents, and their

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1 spouses, are rate payers of Pacific Power & Light who may be
2 affected by the outcome of these proceedings.

3 3. The presence of Local 125 in the case will not
4 unnecessarily broaden the issues or burden the proceedings in
5 this matter. Local 125 seeks by this intervention only the right
6 to be kept fully apprised of all issues raised by the application
7 of PP&L and UP&L and to be heard on those issues affecting Local
8 125's interests.

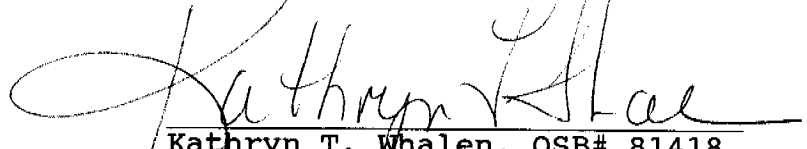
9 4. Local 125 recognizes that this petition for
10 intervention is late filed. Local 125 was not on the
11 Commission's service list for this proceeding, and it was left to
12 learn of the filing deadlines by word of mouth. Local 125
13 received notice of the deadlines only last week as a result of
14 its telephone call to the Utah Public Services Commission. Local
15 125 received pertinent information on the procedures for filing
16 and an application for intervention on November 2, 1987 and
17 promptly prepared this intervention request. Local 125
18 represents the granting of this petition will in no way hinder or
19 delay these proceedings and will prejudice the interests of no
20 other party. On the other hand, failure to allow Local 125 to
21 intervene may result in significant prejudice to the interests of
22 members of Local 125 if it is denied the opportunity to make its
23 position known on issues which may vitally impact the Union's
24 bargaining unit.

25 5. Local 125 would request that if this petition is
26 granted, Kathryn T. Whalen, legal counsel for Local 125, Suite

1 1450, One S.W. Columbia, Portland, Oregon 97258 be designated as
2 a party to receive notice on behalf of Local 125.

3 Respectfully submitted this 3rd day of November, 1987.

4 LOCAL 125, INTERNATIONAL
5 BROTHERHOOD OF ELECTRICAL
6 WORKERS

7 
8 Kathryn T. Whalen, OSB# 81418
9 Legal Counsel

CERTIFICATE OF MAILING

I hereby certify that I served the foregoing
Application to Intervene of Local 125, IBEW
upon the following persons at the following addresses:

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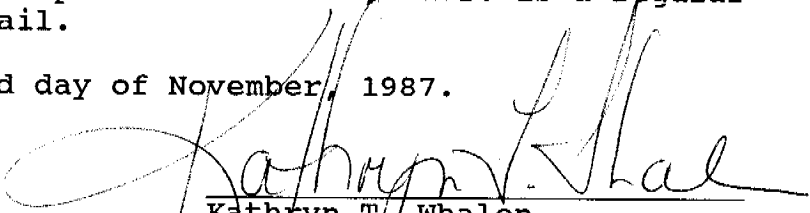
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16
17 on the 3rd day of November, 1987, by mailing to each of them
18 a correct copy thereof, certified by me as such, contained in
19 a sealed envelope, with postage prepaid, addressed to each of
20 them at their regular office address indicated above, and
deposited in the Post Office at Portland, Oregon. Between said
addresses to which said copies were mailed, there is a regular
communication by U.S. Mail.

21 Dated this 3rd day of November, 1987.

22 
23 Kathryn T. Whalen
24 of Attorneys for Local 125
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