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UTAH PUBLIC
SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF:)
)
The Application of Utah Power)
and Light Co., and PC/UP&L)
Merging Corp. (To Be Renamed)
PACIFICORP.) For An Order)
Authorizing The Merger of Utah)
Power and Light Co., and)
PacifiCorp Into PC/UP&L Merging)
Corp. and Authorizing the Issu-)
ance of Securities, Tariffs and)
Transfer of Certificates of)
Public Convenience and Necessity)
and Authorities in Connection)
Therewith.)
)

PETITION FOR INTERVENTION
and
STATEMENT OF GENERAL POSITION
ON THE CASE

Case No. 87-035-27

COMES NOW, A. Wally Sandack, as attorney for and on behalf of, Mike R. Dalpaiz, President of United Mineworkers of America, District #22 (UMWA District 22) and with the prior approval of its parent body, United Mineworkers of America, International Union, hereby petitions and moves this Commission, pursuant to Rule 6.1. to allow said UMWA District #22 to intervene in the above-entitled matter, as its interest appears, and represents:

1. Petitioner represents the classified employees of Utah Power & Light Company's Deercreek, Des-Bee-Dove, Wilburg, and Cottonwood Mines, located at Orangeville, Castledale, and Huntington, Utah, and has a long history of representing said employees with predecessor employers.

2. Petitioner is signatory to a Collective Bargaining Agreement with Utah Power & Light covering employees of its mines, effective through January 31, 1988.

3. That Utah Power & Light, beyond the period of the contract, has a continuing duty to bargain with petitioner as to the terms and conditions of employment, pursuant to 29 USC 151 et. seq. Petitioner's employees are primarily residents of Carbon and Emery Counties, and, as consumers and rate payers, have substantial interests in the above matter.

4. At all times pertinent, UMWA District #22 and its subordinate labor organizations locals, 1769, 1859, and 2176, represent approximately 700 employees at UP&L Utah coal mines under effective labor agreements.

5. That the Commission has previously allowed the intervention by this petitioner in the proceedings inquiring into the 1982 coal case.

6. That petitioner has direct and long-term interests in issues to be considered by the Commission in the above matter. These interests are generally described as follows:

A. Petitioner may be called to testify or desires to provide evidence affecting and relating to matters regulated by the collective bargaining contract and relationship between Utah Power & Light, and petitioner's labor organizations, and petitioner's interests need protection.


B. The interests of employees may be affected in terms of their job security; availability of continued employment;

wages, hours, terms and conditions of employment; and recall rights for approximately 400 employees now unemployed.

C. The interest to encourage development and utilization of this State's natural coal resources in order to promote the economic betterment of Utah's industrial base.

For the foregoing reasons, and for others that may appear during full consideration of this matter, Petitioner UMWA District #22 (P. O. Box 783, Price, Utah 84501) prays that its motion be granted, and it be allowed to intervene in this matter.

Dated this 7 day of October 1987.


A. Wally Sandack
Attorney for:
United Mineworkers of America
District #22
Mike R. Dalpaiz, President

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the foregoing Petition for Intervention and Statement of General Position on the Case, postage prepaid, on this 7 day of October, 1987, to the following:

Thomas W. Forsgren
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