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Attorneys for Utah Industrial Energy Consumers

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Application of)	
PACIFICORP and SCOTTISH POWER)	DOCKET NO. 98-2035-04
PLC for an Order Approving the Issuance of)	PETITION TO INTERVENE
PACIFICORP Common Stock)	
)	
)	

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In accordance with Rule 756-100-6 of the Public Service Commission’s Rules of Practice and Procedure and the provisions of Utah Code Ann. § 63-46b-9, Abbott Critical Care, Amoco Oil Company, Fairchild Semiconductor Corporation, Holnam, Inc., Kennecott Utah Copper Corporation, Kimberly-Clark Corporation, Micron Technology, Inc., Praxair, Inc., and Westinghouse/Western Zirconium Division, (hereinafter and throughout the course of this proceeding referred to as “Utah Industrial Energy Consumers” or “UIEC”), hereby move the Commission for leave to intervene in the above-referenced proceeding.

In support of this petition to intervene, the UIEC state as follows:

1. On the Joint Application of Scottish Power PLC and PacifiCorp for an Order Approving the Issuance of PacifiCorp Common Stock, the Public Service Commission has opened a formal docket.

2. The UIEC are a group of large customers who take service from PacifiCorp under rate Schedule 9 or under special contracts.

3. The UIEC have a direct, immediate and substantial interest in this proceeding as customers of PacifiCorp because the rates they pay for electric service and the quality and reliability of the service they enjoy may be affected by the transaction and the Commission's decision thereon. In addition, the movement to competition may be affected by this transaction and the Commission's decision.

4. To the UIEC's knowledge, the interests of the UIEC will not be represented by any other party to this proceeding.

5. If the UIEC is granted intervention, they hereby request that service of all pleadings, notices, etc., be made to the following:

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6. The interests of justice and the orderly and prompt conduct of this proceeding will be enhanced and not be impaired by the UIEC's intervention.

7. The UIEC have not completed their discovery and evaluation of the transaction on rates, service quality or potential competition. Therefore, the UIEC have not

yet determined the precise nature of the relief they will seek and request that the Commission grant them intervention as their interests may appear.

WHEREFORE, the UIEC requests that the Public Service Commission enter an order permitting the UIEC intervene in this docket, and to participate to the full extent allowed by the law and the Commission's rules.

DATED this ____ day of January, 1999.

PARSONS BEHLE & LATIMER

F. Robert Reeder
William J. Evans
Attorneys for UIEC

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of January, 1999, I caused to be mailed,
first class, postage prepaid, a true and correct copy of the foregoing **PETITION TO
INTERVENE** to:

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