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BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF UTAH

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|----------------|---|---------------------|
| IN RE: |) | |
| |) | |
| |) | PETITION FOR |
| PACIFICORP |) | INTERVENTION |
| SCOTTISH POWER |) | BY IBEW LOCAL 57 |
| |) | |
| Applicants, |) | |
| |) | |
| |) | Case No. 98-2035-04 |
| |) | |
| |) | |

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Comes now petitioner, by and through counsel, pursuant to §63-46b-9 UCA as amended and Commission's Rules of Practice R746-100-7, and hereby petitions the Commission to permit it to intervene in the above matter and represents as follows:

1. Petitioner, International Brotherhood of Electrical Workers, Local 57 is a labor organization representing 1,995 employees of Applicant Pacificorp, in its Utah Power and Light Division. Most of these employees reside in Utah. The employees work in applicant's power supply and commercial operations.

2. Employees' rights and interests may be substantially affected by this proceeding. Any changes in employment, local control and environment due to the merger affect the employees which also affects the public interest. Furthermore the ability of the applicant, as affected by the merger, to safely and competently maintain, deliver, develop, generate, and sell electrical service impacts the employees. Petitioner has not fully developed issues

with which it may be concerned. Petitioner should be permitted to intervene as its interests may appear during the proceeding.

3. Petitioner was unaware of the prior schedule requiring intervention by February 18, 1999. Subsequent filings of record by other parties have brought into issue matters, such as described in the foregoing paragraph, all of which substantially affect the interests of employees.

4. The orderly and prompt conduct of these proceedings will not be delayed, impaired or prejudiced by permitting intervention. Petitioner does not anticipate raising any issues other than those which have been previously raised by the parties. Intervenors have otherwise been permitted to submit direct testimony on issue by June 18, 1999 and to justify its relevance at such time. Petitioner could meet the existing timetable.

5. Petitioner's interests are not adequately represented by any party to the proceeding.

6. Notices and pleading should be sent to:

ARTHUR F. SANDACK, Esq
8 East Broadway, Ste 620
Salt Lake City, Utah 84111

WHEREFORE PETITIONER prays that the Commission permits that it be permitted to intervene in the above proceedings as its interests appear and grant such relief as deemed justified by the Commission.

Dated this ___ day of _____, 1999.

Arthur F. Sandack