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Attorneys for AMERICAN PACIFIC CORPORATION
and WESTERN ELECTROCHEMICAL

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)
) **PETITION** **OF**
AMERICAN
Questar Gas Company for an) **PACIFIC CORPORATION**
Increase in Rates and Charges) **AND WESTERN**
)
) **ELECTROCHEMICAL**
) **FOR LEAVE TO INTERVENE**
)
) **Docket No. 02-057-02**
)

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Code R746-100-7, AmericanPacific Corporation (“AMPAC”), a Delaware corporation, and Western Electrochemical (“WECCO”), a division of AMPAC, hereby petition for leave to intervene in the above referenced matter. In support of its Petition, AMPAC and WECCO submit as follows:

A. The Legal Interests of AMPAC and WECCO will be Substantially Affected.

1. AMPAC is the parent company of several chemical businesses located approximately thirteen (13) miles west of Cedar City in Iron County, Utah. One of the divisions of AMPAC in Iron County is WECCO.

2. At its Iron County plant, WECCO manufactures a chemical known as ammonium perchlorate (“AP”). Among other things, AP is used as an oxidizer in the production of solid rocket motors for use in the space shuttle program and defense weapons systems for NASA, the Department of Defense, and selected allies of the United States. The WECCO plant uses natural gas and is connected to the Kern River interstate pipeline system by an 8-mile gas line constructed and owned by Questar Gas Company (“Questar”). In addition, WECCO is connected to the Questar “Indianola” pipeline system by a 13-mile gas line constructed for WECCO, at WECCO's expense, and used by Questar to transport gas from the Kern River pipeline into the Cedar City area.

3. AMPAC and WECCO request that all pleadings, correspondence, discovery, and other documents be served on the following persons:

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4. In its current status as an interruptible transportation customer of Questar, AMPAC and WECCO have a clear and direct interest in participating in the application of Questar for an increase in rates and charges. The outcome of these proceedings may have a substantial effect on AMPAC and WECCO.

5. Because of the early stage of these proceedings, AMPAC and WECCO have not fully determined what evidence they may present and what positions it may take on the various aspects of Questar's application. Nevertheless, issues that AMPAC and WECCO currently intend to pursue include: (1) cost of service, (2) rate design, and (3) interruptible service procedures. AMPAC and WECCO reserve the right to modify this list of issues as we move forward through the proceedings.

B. AMPAC and WECCO's Intervention would not Impair the Orderly and Prompt Conduct of the Proceedings.

6. The interest of AMPAC and WECCO in the outcome of this proceeding will not be adequately represented by any other party, nor will AMPAC and WECCO's participation impair the conduct of the proceeding. AMPAC and WECCO's participation will promote the interests of justice.

WHEREFORE, for the reasons set forth above, AMPAC and WECCO request that the Public Service Commission grant this Petition to Intervene and permit them to participate in this proceeding with full rights as a party.

DATED this ____day of June, 2002.

PARR WADDOUPS BROWN GEE &
LOVELESS

By:

Steven J. Christiansen
Attorney for AMPAC and
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this ____ day of June, 2002, to the following:

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