

Capt Robert C. Cottrell, Jr.
AFLSA/ULT
Utility Litigation Team
139 Barnes Drive, Suite 1
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(850) 283-6350
Date Submitted: 18 July 2002

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application Of)	Docket No. 02-057-02
Questar Gas Company for an Increase)	
In Rates and Charges)	MOTION FOR LEAVE TO
)	INTERVENE

Now comes the United States Executive Agencies (“USEA”), by and through its counsel, Captain Robert C. Cottrell, Jr., and pursuant to Utah Admin. R. R746-100-7 (2000) and Utah Code Ann. § 63-46b-9, respectfully requests that the Commission grant this Motion for Leave to Intervene.

In support thereof USEA states:

1. That under Docket No. 02-057-02, Questar, has applied to the Utah Public Service Commission for permission to increase its rates and charges for natural gas service rendered in Utah in the annualized amount of \$23,017,000.
2. That USEA operates several facilities within Utah, including Hill Air Force Base.
3. That these facilities currently receive natural gas service under various tariffs from Questar. Hill AFB currently receives both residential and industrial natural gas service.
4. That the rates paid by USEA for natural gas service are likely to be affected by the outcome of this proceeding. USEA’s interests, due to sovereign immunity, cannot be adequately represented by any other party. USEA, at this point in the process, has not decided what position

it may take on various issues in this case but does find concern both over rate design and cost of service matters.

5. That USEA has a substantial interest in this proceeding.

Wherefore, USEA prays that the Commission grant it the following relief:

- A. That it be granted Leave to Intervene in and become a party to this proceeding;
- B. That the following be added to the service list in this proceeding:

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Capt Kristine Hoffman
OO-ALC/JAN
6026 Cedar Lane, Bldg 1278
Hill AFB, UT 84056

C. That the Commission grant such other relief as it deems appropriate.

Respectfully submitted,

UNITED STATES EXECUTIVE AGENCIES

Captain Robert C. Cottrell, Jr.
Utility Litigation Team
General Litigation Division
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Dated: _____

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I HEREBY CERTIFY that true and correct copies of the U.S. Executive Agencies' Motion to Intervene and Appendix A to Protective Order and were mailed to each of the following this _____ day of July 2002:

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