

Mark C. Moench, Utah Bar No. 2284  
Daniel Solander, Utah Bar No. 11467  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, Utah 84111  
Telephone No. (801) 220-4014  
Facsimile No. (801) 220-3299  
Email: daniel.solander@pacificorp.com

*Attorneys for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

|   |   |                            |
|---|---|----------------------------|
|   | ) |                            |
|   | ) |                            |
| In the Matter of the Application of Questar | ) | DOCKET NO. 07-057-13       |
| Gas Company to File a General Rate Case     | ) |                            |
|   | ) |                            |
|   | ) | <b>Motion to Intervene</b> |
|   | ) |                            |
|   | ) |                            |
|   | ) |                            |

---

Rocky Mountain Power, by and through counsel, hereby petitions the Public Service Commission of Utah (“Commission”) for intervention in the above-captioned matter pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin R746-100-7.

The grounds for the petition are as follows.

1. Rocky Mountain Power is a division of PacifiCorp. PacifiCorp is an Oregon corporation that provides electric service to retail customers through its Rocky Mountain Power division in the states of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington (referred to herein as the “Company” or “Rocky Mountain Power”).

2. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 760,000 customers and has approximately 2,400 employees in Utah. Rocky Mountain Power's principal place of business in Utah is 201 South Main Street, Suite 2300, Salt Lake City, Utah 84111.

3. Rocky Mountain Power and its customers have a significant interest in the above-captioned matter and their legal interests may be substantially affected by the outcome. Rocky Mountain Power and Questar are parties to a contract whereby Questar provides natural gas transportation to Rocky Mountain Power's Lake Side generation plant. The transportation agreement between PacifiCorp and Questar Gas Company governing this transportation includes a provision in which PacifiCorp is to pay a transportation rate defined by the Questar Gas Tariff as filed with the Utah PSC and as lawfully amended or changed from time to time. Such contract forms the cost of service included in their current rate case. In addition, Rocky Mountain Power could also provide information that would aid the Commission in evaluation of the evidence in this proceeding.

4. Rocky Mountain Power accepts the record and procedural schedule set forth in this Docket and will not seek to revisit any decisions the Commission has already made. Rocky Mountain Power's intervention and participation in this matter will not materially impair the prompt and orderly conduct of this proceeding. Rocky Mountain Power requests that copies of all notices and filings in this docket be served on:

David L. Taylor  
Utah Regulatory Affairs Manager  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, Utah 84111  
E-mail: [dave.taylor@pacificorp.com](mailto:dave.taylor@pacificorp.com)

Daniel E. Solander  
Senior Counsel  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, Utah 84111  
E-mail: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission enter an Order granting its Motion to Intervene in this Docket allowing Rocky Mountain Power to participate to the full extent allowed by law.

Dated this \_\_ day of April, 2008.

Respectfully submitted,

ROCKY MOUNTAIN POWER

---

Mark C. Moench, Utah Bar No. 2284  
Daniel E. Solander, Utah Bar No. 11467  
201 South Main Street, Suite 2300  
Salt Lake City, Utah 84111  
Telephone No. (801) 220-4014  
Facsimile No. (801) 220-3299  
Email: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

*Attorneys for Rocky Mountain Power*

## CERTIFICATE OF SERVICE

I hereby certify that on this \_\_\_ day of April 2008, I caused to be e-mailed a true and correct copy of the foregoing Motion to Intervene of Rocky Mountain Power to the following:

## CERTIFICATE OF SERVICE

Michael Ginsberg  
Patricia E. Schmid  
Assistant Attorney Generals  
Division of Public Utilities  
Heber Wells Building, Suite 500  
160 East 300 South  
Salt Lake City, UT 84111  
mginsberg@utah.gov  
pschmid@utah.gov

Paul H. Proctor  
Assistant Attorney General  
Heber M. Wells Building, Suite 500  
160 East 300 South  
Salt Lake City, UT 84111  
pproctor@utah.gov

Gary A. Dodge  
Hatch James & Dodge  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
gdodge@hjdllaw.com

F. Robert Reeder  
William J. Evans  
Vicki M. Baldwin  
Parsons Behle & Latimer  
201 South Main Street, Suite 1800  
PO Box 45898  
Salt Lake City, UT 84145-1234  
bobreeder@parsonsbehle.com  
wevans@parsonsbehle.com  
vbaldwin@parsonsbehle.com

Roger J. Ball  
1375 Vintry Lane  
Salt Lake City, UT 84121

ball.roger@gmail.com

Lee R. Brown  
Roger Swenson  
US Magnesium LLC  
238 North 2200 West  
Salt Lake City, UT 84116  
lee.brown@prodigy.ent  
roger.swenson@prodigy.net

Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Beohm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
mkurtz@bkllawfirm.com  
kboehm@bkllawfirm.com

Ronald J. Day, CPA  
Central Valley Water Reclamation Facility  
800 West Central Valley Road  
Salt Lake City, UT 84119  
dayr@cvwrf.org

Damon E. Xenopoulos  
Shaun C. Mohler  
Brickfield, Burchette, Ritts & Stone, P.C.  
105 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, DC. 20007  
dex@bbrslaw.com  
scm@bbrslaw.com

Gerald H. Kinghorn  
Jeremy R. Cook  
Parsons Kinghorn Harris, P.C.  
111 East Broadway, 11<sup>th</sup> Floor

Salt Lake City, UT 84111  
ghk@pkhlawyers.com

Kevin Higgins  
Neal Townsend  
Energy Strategies  
39 Market Street, Suite 200  
Salt Lake City, UT 84101  
khiggins@energystrat.com  
ntownsend@energystrat.com

Dale F. Gardiner  
Van Cott, Bagley, Cornwall & McCarthy  
36 South State Street, Suite 1900  
Salt Lake City, UT 84111  
dgardiner@vancott.com

Janee Briesemeister  
AARP  
98 San Jacinto Blvd., Suite 750  
Austin, TX 78701  
jbriesemeister@aarp.org

Utah Ratepayers Alliance  
c/o Betsy Wolf  
Salt Lake Community Action Program  
764 South 200 West  
Salt Lake City, Utah 84101  
[bwolf@slcap.org](mailto:bwolf@slcap.org)

C. Scott Brown (4802)  
Colleen Larkin Bell (5253)  
Questar Gas Company  
180 East First South  
P.O. Box 45360  
Salt Lake City, Utah 84145-0360  
[Scott.Brown@questar.com](mailto:Scott.Brown@questar.com)  
[Colleen.Bell@questar.com](mailto:Colleen.Bell@questar.com)

Gregory B. Monson (2294)  
Stoel Rives LLP  
201 S. Main Street, Suite 1100  
Salt Lake City, UT 84111  
[gbmonson@stoel.com](mailto:gbmonson@stoel.com)

---