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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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)	
In the Matter of the Application of Questar)	DOCKET NO. 09-057-16
Gas Company to Increase Distribution Non-)	
Gas Rates and Charges and Make Tariff)	
Modifications)	Motion to Intervene
)	
)	
)	

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. 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'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:

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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 December, 2009.

Respectfully submitted,

ROCKY MOUNTAIN POWER

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CERTIFICATE OF SERVICE

I hereby certify that on this ___ day of December 2009, I caused to be e-mailed a true and correct copy of the foregoing Motion to Intervene of Rocky Mountain Power to the following:

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