

Mark C. Moench
R. Jeff Richards
Rocky Mountain Power
201 South Main St.
Suite 2300
Salt Lake City, UT 84111
(801) 220-4734 Direct Dial
(801) 220-3299 Fax
Email: Mark.Moench@pacificorp.com
Jeff.Richards@pacificorp.com

Gregory B. Monson
Ted D. Smith
Stoel Rives LLP
201 South Main St., Ste. 1100
Salt Lake City, Utah 84111
(801) 328-3131
(801) 578-6999
Email: gbmonson@stoel.com
tsmith@stoel.com

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation into the rules, standards or procedures other states have adopted to ensure safe, reliable and adequate utility service and facilities. Reference: Utah Code Section 54-3-1	Docket No. 08-999-07 PETITION TO INTERVENE OF ROCKY MOUNTAIN POWER
--	---

Pursuant to Utah Code Ann. § 63-46b-9 and Rule R746-100-7, Rocky Mountain Power hereby petitions for leave to intervene in this docket.

In support of this petition, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a certificated provider of electric service to several hundred thousand customers in the State of Utah and is regulated in certain aspects of its provision of electric service by the Public Service Commission of Utah (“Commission”)

2. On September 4, 2008, the Commission issued an action request to the Division of Public Utilities (“DPU”) requesting that the DPU “[i]nvestigate what rules, standards or procedures other states have adopted to ensure safe, reliable and adequate utility service and facilities. Also examine the enabling statutes and any related penalties of those other states that have adopted such rules, standards or procedures and compare them to Utah Code Section 54-3-1.”

3. Given that the action request could result in recommendations of the DPU (or other parties) regarding rules, standards, or procedures that could apply to Rocky Mountain Power, the legal rights and interests of Rocky Mountain Power may be substantially affected by this proceeding.

4. Rocky Mountain Power seeks to intervene for purposes of protecting its interests as they may appear.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Rocky Mountain Power to intervene.

6. Notices in this proceeding should be sent to the following:

R. Jeff Richards
Rocky Mountain Power
201 South Main St., Suite 2300
Salt Lake City, UT 84111
(801) 220-4734 Direct Dial
(801) 220-3299 Fax
Email: Jeff.Richards@pacificorp.com

David Taylor
Rocky Mountain Power
201 South Main St., Suite 2300
Salt Lake City, UT 84111
(801) 220-2923 Direct Dial
(801) 220-3299 Fax
Email: Dave.Taylor@pacificorp.com

WHEREFORE, Rocky Mountain Power requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 10th day of October, 2008.

Gregory B. Monson
Ted D. Smith
Stoel Rives LLP

Mark C. Moench
R. Jeff Richards
Rocky Mountain Power

Attorneys for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 10th day of October, 2008, to the following:

Michael Ginsberg
Patricia Schmid
Assistant Attorney General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov

Paul Proctor
Assistant Attorney General
160 East 300 South, 5th Floor
Salt Lake City, UT 84111
pproctor@utah.gov
