

BILL THOMAS PETERS - 2574

DAVID W. SCOFIELD - 4140

PARSONS, DAVIES, KINGHORN & PETERS, P.C.

185 South State Street, Suite 700

Salt Lake City, Utah 84111

Telephone: (801) 363-4300

Facsimile: (801) 363-4378

Attorneys for the Complainant Counties and All Other Persons
and/or Entities similarly situated

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the matter of the Complaint of:

BEAVER COUNTY, et al.,

Complainants,

-vs-

Qwest Corporation fka U.S. WEST COMMUNICATIONS,
INC., fka MOUNTAIN STATES TELEPHONE & TELEGRAPH
SERVICES, INC.,

Respondent.

Docket No. 01-049-75

**MOTION TO CONSOLIDATE AND
MOTION TO AMEND**

In the matter of the Request of:

BEAVER COUNTY, et al., FOR AN ORDER DIRECTING THAT
1988 THROUGH 1996 PROPERTY TAX REFUNDS BE
RETURNED TO THE RATE PAYERS FROM WHOM SAID
PROPERTY TAXES WERE PREVIOUSLY RECOVERED AND FOR
SIMILAR RELIEF FOR 1997, 1998 AND SUBSEQUENT
YEARS.

Petitioners.

Docket No. 98-049-48

Petitioners in Docket No. 98-049-48 and Complainants in Docket No. 01-049-75, hereby move the Commission to enter an order consolidating the two cases and allowing amendment of the petition filed herein and the filing of an amended complaint, superceding the petition and all prior complaints in the form

attached hereto as Exhibit "A." Grounds for this motion are that the original petition and complaint allege facts setting forth the issues that should be decided by this Commission and, therefore, there is no prejudice to any party from the amendment. Consolidation will enhance the economy and efficiency of proceeding in these actions and the Commission's review of the issues herein. This motion is filed in each case and is supported by an accompanying memorandum in each case.

DATED this _____ day of December, 2004.

PARSONS, DAVIES, KINGHORN & PETERS, P.C.

BILL THOMAS PETERS

DAVID W. SCOFIELD

Attorneys for Petitioners and Complainants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion was mailed, postage prepaid, this _____ day of December, 2004, to the following:

Michael L. Ginsberg
Kent Walgren
Reed Warnick
Assistant Attorneys General
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111

Gregory B. Monson
Ted D. Smith
Stoel Rives LLP
201 South Main, Suite 1100
Salt Lake City, Utah 84111
Attorneys for Qwest

David W. Scofield