

Zion Development
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Submitted October 10, 2004

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF
QWEST CORPORATION'S LAND
DEVELOPMENT AGREEMENTS (LDA)
TARIFF PROVISIONS**

Docket No. 03-049-62

**ZION DEVELOPMENT
PETITION TO INTERVENE**

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Rule 746-100-7, Zion Development respectfully petitions the Public Service Commission of Utah (the "Commission") for leave to intervene in the above-captioned proceeding concerning Qwest Corporation's Land Development Agreements tariff provisions in the state of Utah. In support of its petition, Zion Development represents and states as follows:

1. Zion Development is a Developer/ Home Builder, developing and building over 200 homes per year in residential subdivisions throughout the state of Utah and specifically along the Wasatch Front.
2. As a Developer/ Home Builder, Zion Development is required by law to provide utilities, including telephone service, to the building lots we develop and /or the homes we build in Utah. The outcome of Qwest Corporation's LDA Tariff docket could result in significant added costs to consumers. This is due to increased development and home building time, caused by slow response time to project timetables on the part of

telephone and other utilities to Zion Development. Thus, the legal interests of Zion Development could be directly affected by the outcome of this proceeding.

3. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing Zion Development to intervene.

WHEREFORE, Zion Development respectfully requests that the Commission enter an Order granting Zion Development Petition to Intervene as a party in this docket, allowing Zion Development to participate to the full extent allowed by the rules of the Commission and by Utah Law.

RESPECTFULLY SUBMITTED this _____ day of _____, 2004.

Zion Development

By: Chad Stokes
Title: Project Manager

CERTIFICATE OF SERVICE

I hereby certify that on the _____ day of _____, an original, with five (5) true and correct copies and an electronic copy, of Zion Development PETITION TO INTERVENE was hand-delivered to:

Julie Orchard
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
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Salt Lake City, Utah 84114
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and a true and correct copy was mailed, postage prepaid thereon, to:

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