

Bald Mountain Development, LLC
Rex Daley
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Submitted: September 27, 2004

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

| | | |
|------------------------------|---|---------------------------------------|
| IN THE MATTER OF |) | Docket No. 03-049-62 |
| QWEST CORPORATION'S LAND |) | |
| DEVELOPMENT AGREEMENTS (LDA) |) | Bald Mountain Development, LLC |
| TARIFF PROVISIONS |) | Rex Daley |
| |) | |
| |) | PETITION TO INTERVENE |
| |) | |

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Rule 746-100-7, Bald Mountain Development, LLC (“Bald Mountain”) 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, Bald Mountain represents and states as follows:

1. Bald Mountain is a business, for residential land development throughout the state of Utah, principally in the Utah valley region.

2. As a residential land developer, within the telecommunications service area of Qwest Corporation, Bald Mountain needs Qwest telephone networks to be developed in its projects here in Utah. The outcome of Qwest Corporation's LDA Tariff docket could result in significant added costs and construction delays to Bald Mountain. Thus, the legal interests of Bald Mountain 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 Bald Mountain to intervene.

WHEREFORE, Bald Mountain respectfully requests that the Commission enter an Order granting Bald Mountain's Petition to Intervene as a party in this docket, allowing Bald Mountain to participate to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 27th day of September, 2004.

Bald Mountain Development, LLC

By: Rex Daley

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September, 2004; an original, with five (5) true and correct copies and an electronic copy, of Bald Mountain's **PETITION TO INTERVENE** was hand-delivered to:

Julie Orchard
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, Utah 84114
lmathie@utah.gov

and a true and correct copy was mailed, postage prepaid thereon, to:

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Patricia E. Schmid
Division of Public Utilities
Heber M. Wells Building, Fifth Floor
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Salt Lake City, Utah 84114

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