

Georgetown Development  
2230 N. University Pkwy. 7G  
Provo, Utah 84604  
Tele: 801-374-0772  
Fax: 801-375-0502

Submitted October 10, 2004

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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

**Docket No. 03-049-62**

**GEORGETOWN DEVELOPMENT  
PETITION TO INTERVENE**

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Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Rule 746-100-7, Georgetown 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, Georgetown Development represents and states as follows:

1. Georgetown Development is a Developer/ Home Builder, developing and building over 50-150 homes per year in residential subdivisions throughout the state of Utah and specifically along the Wasatch Front.

2. As a Developer/ Home Builder, Georgetown 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 Georgetown Development. Thus, the legal interests of Georgetown 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 Georgetown Development to intervene.

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

RESPECTFULLY SUBMITTED this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

Georgetown Development

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By: Eric Oxborrow  
Title: Construction Supervisor

**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 Georgetown Development 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](mailto:lmathie@utah.gov)

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

Michael L. Ginsberg  
Patricia E. Schmid  
Division of Public Utilities  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Reed T. Warnick  
Oliwia Smith  
Committee of Consumer Services  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Jerold G. Oldroyd  
Jennifer Rigby  
Sharon M. Bertelsen  
Ballard Spahr Andrews & Ingersoll, LLP  
201 South Main Street, Suite 600  
Salt Lake City, Utah 84111

Gregory B. Monson  
David L. Elmont  
Stoel Rives LLP  
201 South Main Street, Suite 1100  
Salt Lake City, Utah 84111

Kevin M. McDonough  
Mismash & McDonough, LLC  
136 South Main Street, Suite 404  
Salt Lake City, Utah 84101

Robert C. Brown  
Qwest Corporation  
1801 California Street, 47<sup>th</sup> Floor  
Denver, Colorado 80202

Laura Scholl  
Qwest Corporation  
250 Bell Plaza, Suite 1603  
Salt Lake City, Utah 84111

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