

Marriott Construction  
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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**

**MARRIOTT CONSTRUCTION  
PETITION TO INTERVENE**

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

1. Marriott Construction is a Developer/ Home Builder, developing and building over 150-200 homes per year in residential subdivisions throughout the state of Utah and specifically along the Wasatch Front.

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

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

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

Marriott Construction

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By: Jeff Hales  
Title: Development Coordinator

**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 **Marriott Construction 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  
[Imathie@utah.gov](mailto:Imathie@utah.gov)

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

Michael L. Ginsberg  
Patricia E. Schmid  
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Heber M. Wells Building, Fourth Floor  
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Salt Lake City, Utah 84114

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