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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF THE
APPLICATION OF MOUNTAIN SEWER
CORPORATION FOR GENERAL RATE
INCREASE**

**CELTIC BANK CORPORATION'S
PETITION TO INTERVENE**

Docket Nos. 11-097-01, 11-097-02, 11-097-03

Celtic Bank Corporation by and through its counsel, hereby petitions the Public Service Commission of Utah, pursuant to Utah Code Ann. § 63G-4-207, and Utah Rule of Civil Procedure 24, for permission to intervene in Docket Nos. 11-097-01, 11-097-02, 11-097-03.

1. Celtic Bank is the current owner of the Edgewater Beach Resort property, including portions of Phase 1 thereof, and is a current customer within Mountain Sewer's service area.

(See App. for General Rate Increase, ¶ 4.)

2. As a property owner, customer and rate payer within Mountain Sewer's service area Celtic Bank has an interest directly related to property which will be impacted by any action(s) taken in this matter.

3. In order to adequately protect its interests, Celtic Bank seeks to intervene in order to protect its interests and is not represented by any of the parties to this action.

4. This petition is timely under the Public Service Commission's Scheduling Order and Notice of Hearings issued May 14, 2012, which states that the deadline for requests for intervention is August 16, 2012.

5. All notices pertaining to this matter should be sent to, or served upon:

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DATED: May ____, 2012

ANDERSON & KARRENBERG

Steven W. Dougherty
Leslie K. Rinaldi
Attorneys for Celtic Bank

CERTIFICATE OF MAILING

I hereby certify that on May ____, 2012, I delivered a true and correct copy of the foregoing **CELTIC BANK CORPORATION'S PETITION TO INTERVENE**, by email and first-class mail, postage prepaid, to the following:

By U.S. Mail:

Ronald J. Catanzaro
Mountain Sewer Corporation
932 Ski Lake Drive
Huntsville, UT 84317

James and Dawn Martell
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