

PARSONS BEHLE & LATIMER

Justina A. Caviglia, Esq.

Nevada Bar No. 9999

WSBA No. 52402

Sean W. Robison, Esq.

Utah Bar No. 18527

201 South Main Street, Suite 1800

Salt Lake City, Utah 84111

Telephone: 801.532.1234

Facsimile: 801.536.6111

jcaviglia@parsonsbehle.com

srobison@parsonsbehle.com

Attorneys for Legacy Mountain Homeowners' Association, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Request of Legacy Sweetwater Inc. for a Letter of Exemption from Utah Public Service Commission Regulation.

Docket No. 25-2280-02

**PETITION FOR LEAVE TO
INTERVENE OF
LEGACY MOUNTAIN HOMEOWNERS'
ASSOCIATION, INC.**

Pursuant to Utah Code § 63G-4-207 and Utah Administrative Code Rule R746-1-108, Legacy Mountain Homeowners' Association, Inc. ("Legacy Mountain HOA"), on behalf of its members, files this Petition for Leave to Intervene ("Petition") in the above-captioned docket and requests that the Public Service Commission of Utah ("Commission") issue an order allowing Legacy Mountain HOA to participate fully in this matter.

In support of its Petition for Leave to Intervene, Legacy Mountain HOA states as follows:

1. On March 11, 2025, Legacy Sweetwater Inc. ("Sweetwater") filed its Request for a Letter of Exemption from Utah Public Service Commission Regulation ("Request").
2. Legacy Mountain HOA is a non-profit corporation as defined by Utah Code § 16-6a-102(37)(a)-(b), whose members are comprised of the homeowners in the Northridge

Subdivision, Skyline Heights Subdivision, The Meadows Subdivision, and The Hollows Subdivision, in Sanpete County, Utah.

3. Legacy Mountain HOA, through its members, has a direct, immediate, and substantial interest in this proceeding because the rate its members pay for water service and the adequacy of water service from Sweetwater will be affected by the Commission's decision on the Request.

4. Legacy Mountain HOA's interests will not be adequately represented by any other party to these proceedings.

5. If Legacy Mountain HOA is granted leave to intervene in this proceeding, it requests that service of all pleadings, notices, and other filings in this docket be made to:

Justina A. Caviglia, Esq.
Sean W. Robison, Esq.
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: 801.536.6767
jcaviglia@parsonsbehle.com
srobison@parsonsbehle.com

Legacy Mountain Homeowners' Association, Inc.
Attn: Richard Sudweeks, President
6171 Don Leone Drive
Taylorsville, Utah 84129

Ms. Caviglia is licensed to practice law in the State of Nevada and the State of Washington. Certificates of Good Standing from State of Nevada and the State of Washington are attached hereto as Exhibit 1, in accordance with Utah Administrative Code Rule R746-1-107(1)(a)(ii).

6. Legacy Mountain HOA's intervention in this docket will not materially impair the interests of justice or the orderly and prompt conduct of this proceeding.

WHEREFORE, Legacy Mountain HOA requests that the Commission enter an Order granting Legacy Mountain HOA permission to intervene in this docket and to participate to the full extent allowed by the law.

DATED this 11th day of April 2025.

PARSONS BEHLE & LATIMER

/s/ Sean W. Robison
Justina A. Caviglia, Esq.
Nevada Bar No. 9999
WSBA No. 52402
Sean W. Robison, Esq.
Utah Bar No. 18527
201 South Main Street
Salt Lake City, Utah 84111
Telephone: 801.536.6767
jcaviglia@parsonsbehle.com
srobison@parsonsbehle.com

*Attorneys for Legacy Mountain Homeowners'
Association, Inc.*

CERTIFICATE OF SERVICE

Docket No. 25-2280-02

I hereby certify that on this 11th day of April 2025, I caused a true and correct copy of the foregoing document, **PETITION FOR LEAVE TO INTERVENE OF LEGACY MOUNTAIN HOMEOWNERS' ASSOCIATION, INC.**, to be served via electronic mail to the following:

Legacy Sweetwater, Inc.

Dave Anderson: dave@legacymountain.com

Lorne Berry: lberry13@gmail.com

Shane Berry: shane@legacymountain.com

Division of Public Utilities

Chris Parker: chrisparker@utah.gov

Madison Galt: mgalt@utah.gov

dpudatarequest@utah.gov

Assistant Utah Attorney General

Patricia Schmid: pschmid@agutah.gov

Patrick Grecu: pgrecu@agutah.gov

Robert Moore: rmoore@agutah.gov

Office of Consumer Services

Michele Beck: mbeck@utah.gov

Bela Vastag: bvastag@utah.gov

Alyson Anderson: akanderson@utah.gov

Alex Ware: aware@utah.gov

Jacob Zachary: jzachary@utah.gov

ocs@utah.gov

/s/ Roni L. Shaffer

Employee of Parsons Behle & Latimer

Exhibit 1
Certificates of Good Standing

STATE BAR OF NEVADA



CERTIFICATE OF STANDING

Issue Date: 3/31/2025
Attorney Name: Justina A. Caviglia
Nevada Bar Number: 9999
License Type: ATTORNEY
License Status: Active
Admit/Certification Date: 10/17/2006

3100 W. Charleston Blvd.
Suite 100
Las Vegas, NV 89102
phone 702.382.2200
toll free 800.254.2797
fax 702.382.2075

9456 Double R Blvd., Ste. B
Reno, NV 89521-5977
phone 775.329.4100
fax 775.329.0522

www.nvbar.org

To Whom It May Concern:

The State Bar of Nevada records indicate that the attorney named above was admitted or certified to practice in the State of Nevada and is in good standing as of the issue date.

If the attorney's License Type is NMATTORNEY (non-member attorney), they were certified to practice pursuant to Nevada Supreme Court Rule 49.1 'Limited practice certification for certain attorneys'. Refer to License Status for the subsection.

This certification expires 30 days from the issue date unless sooner revoked or rendered invalid by operation of rule or law.

Questions may be directed to memberservices@nvbar.org.

A handwritten signature in blue ink that reads "Mary Jorgensen". The signature is written over a horizontal line.

Mary Jorgensen
Member Services Director

No.2025 -10616013

verify by email at memberservices@nvbar.org

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 52402
)	
OF)	CERTIFICATE
)	
JUSTINA ALYCE CAVIGLIA)	OF
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	GOOD STANDING
)	

I, Sarah R. Pendleton, Clerk of the Supreme Court of the State of Washington, hereby certify

JUSTINA ALYCE CAVIGLIA

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on August 24, 2017, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this Court on the 12th day of February, 2025.

A handwritten signature in blue ink, appearing to read "Sarah R. Pendleton".

Sarah R. Pendleton
Supreme Court Clerk
Washington State Supreme Court