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January 28, 1998

# INTERVENTION

18

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AZ CORP COMMISSION

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~~Arizona Corporation Commission~~  
**DOCKETED**

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JAN 29 1998

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Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007-2996

DOCKETED BY *JW*

**Re: Docket No. RE-00000F-94-0165  
Application for Late Intervention**

Enclosed for filing in this docket are the original and ten copies of PacifiCorp's Application for Late Intervention.

Very truly yours,

*Jennifer J. Paine*  
for James C. Paine

JCP:jlf  
Enclosures  
cc (w/encl): Service List

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AZ CORP COMMISSION

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BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN  
Chairman  
CARL J. KUNASEK  
Commissioner  
RENZ D. JENNINGS  
Commissioner

IN THE MATTER OF THE  
COMPETITION IN THE PROVISION OF  
ELECTRIC SERVICES THROUGHOUT  
THE STATE OF ARIZONA

DOCKET NO. RE-00000<sup>C</sup>f-94-0165

APPLICATION FOR LATE INTERVENTION

PacifiCorp, by and through the undersigned counsel, hereby applies to the Arizona Corporation Commission ("Commission") for Late Intervention in the above-captioned proceeding.

PacifiCorp is a generation, transmission and distribution utility with retail operations in seven western states, significant wholesale operations throughout the western United States, and with growing interest in retail transmission in the eastern United States. As such, we are interested in all aspects of electric restructuring and competition in the electric industry throughout the entire United States. As a current generator and provider of electric service, PacifiCorp's participation will not unduly broaden the issues of this proceeding.

PacifiCorp is aware of the Hearing Officer's December 1, 1997 Procedural Order, which set a deadline of December 21 for intervention and that this Application is being filed later than that date. However, we note that A.A.C. R14-3-105B allows for Applications for Intervention up to five days before the commencement of a proceeding. According to Commission rules, the deadline for such applications in this case is thus February 4, 1998. We further note that the Center for Energy and Economic Development has already been granted late intervention in this proceeding. Finally, PacifiCorp avers that it does not intend to file any testimony in this proceeding, that our intervention will not delay the proceeding in

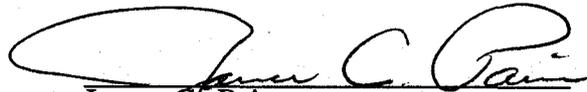
1 any manner, and that no other currently-participating party can adequately represent the  
2 interests of PacifiCorp.

3 PacifiCorp respectfully requests that all communications in this matter be sent to:

4 Bradford A. Borman  
5 PacifiCorp  
6 One Utah Center  
7 Suite 800  
8 201 S Main Street  
9 Salt Lake City, UT 84140

10 For these reasons, PacifiCorp requests the Hearing Officer grant our request for late  
11 intervention in this proceeding.

12 RESPECTFULLY SUBMITTED this 28th day of January, 1998.

13   
14 James C. Paine  
15 Of Attorneys for PacifiCorp

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **Application for Late Intervention** on the following named person(s) on the date indicated below by mailing by first-class mail to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at their last-known address(es) indicated below.

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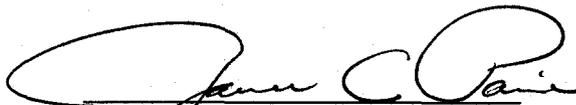
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DATED: January 28, 1998.

A handwritten signature in black ink, appearing to read "James C. Paine". The signature is written in a cursive style with a large, looping initial "J".

James C. Paine  
Of Attorneys for PacifiCorp