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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorneys for Petitioner IBEW Local 57

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Joint Application of
MidAmerican Energy Holdings Company
and PacifiCorp dba Utah Power and Light
Company for an Order Authorizing MEHC
To Acquire PacifiCorp

CASE NO. PAC-E05-8

PETITION TO INTERVENE
BY IBEW LOCAL 57

Comes now Petitioner, IBEW Local 57, by and through counsel, pursuant to Rule 72 of the Rules of Procedure of the Idaho Public Utilities Commission, and hereby petitions the Commission to permit it to intervene in the above matter, stating as follows:

1. Petitioner, International Brotherhood of Electrical Workers, Local 57 is a labor organization representing approximately 1,800 employees of Applicant Pacificorp, in its Utah Power and Light Division. Many of these employees reside in Idaho. The employees work in Applicant's power supply and delivery operations and are covered by the terms of collective bargaining agreements between Petitioner and Applicant PacifiCorp.

2. The name and address of Petitioner for Intervention is :

International Brotherhood of Electrical Workers, Local 57
Byron Nielsen, Business Manager
4551 So. Atherton Drive
Salt Lake City, Utah 84123

3. Petitioner IBEW Local 57 will be represented by:

ARTHUR F. SANDACK
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and

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4. Petitioner's representatives for service are:

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5. Petitioner IBEW Local 57 and its represented employees' rights and interests may be substantially affected by this proceeding as it will affect the management, cost and ability of the Utility to safely and competently maintain and deliver electrical service by the efforts of its labor force. Accordingly, it is in the interests of this petitioner and the public that intervention be granted.

6. Petitioner has yet to determine what its position will be with respect to the pending Application and what evidence Petitioner may wish to submit in support of that position. However, Petitioner should be permitted to intervene as its interests may appear during the proceeding.

7. The interests of justice and the orderly and prompt conduct of these proceedings will not be delayed, or materially impaired or prejudiced by permitting intervention.

8. Petitioner's interests are not adequately represented by any other party to the proceeding.

WHEREFORE, PETITIONER prays that the Commission grant its petition to intervene in the above proceedings, allowing Petitioner to participate fully in the proceedings as a party, as its interests appear, and granting Petitioner such relief as deemed justified by the Commission.

Dated this 31 day of August, 2005.

for 

Arthur F. Sandack



Alan Herzfeld

MAILING CERTIFICATE

I hereby certify that a true and correct copy of the Petition For Intervention by IBEW Local 57 was sent by U.S. first class mail, on the 31 day of August, 2005, to:

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