



INTERVENTION

ORIGINAL

MOHAVE COUNTY ATTORNEY



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Arizona Corporation Commission WILLIAM J. EKSTROM, JR. County Attorney

JAMES J. ZACK JUL 05 2000 Chief Deputy

DOCKETED BY [Signature]

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June 30, 2000

Via Certified Mail Return Receipt Requested #7099 3220 0000 7482 7042

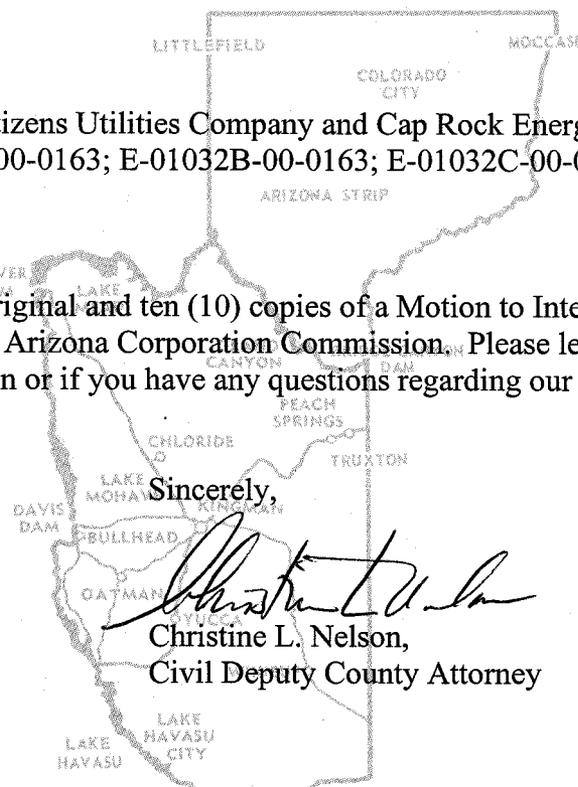
Arizona Corporation Commission Docket Control Center 1200 West Washington Street Phoenix, AZ 85007-2996

RECEIVED AZ CORP COMMISSION JUL 5 11 03 AM '00 DOCUMENT CONTROL

Re: Motion to Intervene in Citizens Utilities Company and Cap Rock Energy Corporation, Docket Nos.: E-01032A-00-0163; E-01032B-00-0163; E-01032C-00-0163; and E-03851A-00-0163

Gentlemen:

Enclosed please find an original and ten (10) copies of a Motion to Intervene in the above-referenced case currently pending before the Arizona Corporation Commission. Please let me know if we need to provide any additional information or if you have any questions regarding our request to intervene in this matter.



Sincerely, Christine L. Nelson, Civil Deputy County Attorney

Enclosure

- cc: Carol Anderson, Supervisor District 1 (w/encl.) (via inter office mail) Jim Zaborsky, Supervisor District 2 (w/encl.) (via inter office mail) Buster Johnson, Supervisor District 3 (w/encl.) (via inter office mail) Richard A. Skalicky, Interim County Manager (w/encl.) (via inter office mail) William J. Ekstrom, Jr., Mohave County Attorney (w/encl.) (via hand delivery) Deborah L. Herbert, Chief Civil Deputy County Attorney (w/encl.) (via hand delivery)

INTERVENTION

ORIGINAL

1 WILLIAM J. EKSTROM, JR.
2 MOHAVE COUNTY ATTORNEY'S OFFICE
3 Deborah L. Herbert #011509
4 Christine L. Nelson #019227
5 Deputy County Attorneys
6 P.O. Box 7000
7 Kingman, AZ 86402
8 (520) 753-0719
9 Attorneys for Mohave County

RECEIVED
AZ CORP COMMISSION

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DOCUMENT CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

7)
8 **IN THE MATTER OF THE JOINT**
9 **APPLICATION BY CITIZENS**
10 **UTILITIES COMPANY, INC. AND**
11 **CAP ROCK ENERGY**
12 **CORPORATION FOR APPROVAL**
13 **OF THE SALE OF CERTAIN**
14 **ELECTRIC UTILITY PROPERTIES**
15 **IN ARIZONA AND THE TRANSFER**
16 **OF THE CERTIFICATE OF**
CONVENIENCE AND NECESSITY
FROM CITIZENS AND ITS ARIZONA
ELECTRIC DIVISION TO CAP ROCK
ENERGY.

DOCKET NOS.: E-01032A-00-0163
E-01032B-00-0163
E-01032C-00-0163
E-03851A-00-0163

MOTION TO INTERVENE

17 Mohave County, Arizona, ("MOHAVE COUNTY") as authorized by its Board of
18 Supervisors, hereby moves the Corporation Commission, ("COMMISSION") pursuant to
19 A.A.C. R14-3-105, to grant MOHAVE COUNTY leave to intervene in the above-
20 captioned proceeding. In support hereof, MOHAVE COUNTY states as follows:

21 1. Citizens Utilities Company's ("CITIZENS") certificated service territory
22 includes geographic areas located within MOHAVE COUNTY, CITIZENS uses rights of
23 way granted by MOHAVE COUNTY, and CITIZENS provides electric service to
24 MOHAVE COUNTY and many of its residents and businesses.

25 2. MOHAVE COUNTY is directly and substantially affected by CITIZENS'
26 proposed asset transfer to Cap Rock Energy Corporation ("CAP ROCK") because the
27 various relationships that CITIZENS currently has with MOHAVE COUNTY are to be
28 assumed by CAP ROCK.

1 3. MOHAVE COUNTY's participation in this proceeding will not unduly
2 broaden the nature or scope of this proceeding. MOHAVE COUNTY, like the
3 COMMISSION, desires to determine if the proposed transfer of assets is in the public
4 interest.

5 4. No other party or intervenor can represent the interests of MOHAVE
6 COUNTY as adequately and specifically as MOHAVE COUNTY.

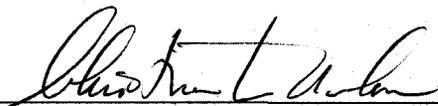
7 5. Service of all correspondence, documents or pleadings should be made to
8 counsel for MOHAVE COUNTY as follows:

9 Christine L. Nelson, Civil Deputy County Attorney
10 P.O. Box 7000
11 Kingman, AZ 86402-7000
12 (520) 753-0719

13 **WHEREFORE**, for all of the foregoing reasons, MOHAVE COUNTY
14 respectfully requests that the COMMISSION issue its order granting this Motion to
15 Intervene.

16 **RESPECTFULLY SUBMITTED** this 30th day of June, 2000.

17 WILLIAM J. EKSTROM, JR.
18 MOHAVE COUNTY ATTORNEY

19 By: 
20 Christine L. Nelson, Civil Deputy County Attorney

1 **CERTIFICATE OF SERVICE**

2 ORIGINAL and ten (10) copies of the
3 foregoing filed by certified mail
4 this 30th day of June, 2000 with the:

5 Arizona Corporation Commission
6 Docket Control Center
7 1200 West Washington Street
8 Phoenix, AZ 85007-2996

9 COPIES of the foregoing were mailed
10 this 30th day of June, 2000 to:

11 Jerry Rudibaugh, Chief Hearing Officer
12 ARIZONA CORPORATION COMMISSION
13 1200 Washington Street
14 Phoenix, AZ 85007

15 Craig A. Marks, Senior Attorney
16 Citizens Utilities Company
17 2901 N. Central Avenue, Suite 1660
18 Phoenix, AZ 85012-2736

19 Michael C. Dotten, Esq.
20 HELLER, EHRMAN, WHITE & McAULIFFE, LLP
21 200 S.W. Market Street, Suite 1750
22 Portland, OR 97201-5718
23 Attorneys for Cap Rock Energy Corporation

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25
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27
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By *D. Campbell*