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# INTERVENTION



**SOUTHWEST GAS CORPORATION**

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Andrew W. Bettwy, Assistant General Counsel

AZ CORP COMMISSION  
DOCUMENT CONTROL  
May 9, 2000

Arizona Corporation Commission  
**DOCKETED**

MAY 09 2000

DOCKETED BY

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Re: **Filing of Application for Leave to Intervene**  
Docket No. E-01032A-00-0163  
E-01032B-00-0163  
E-01032C-00-0163  
E-03851A-00-0163

Accompanying this letter are the original and eleven (11) copies of the above-referenced document. Please accept the original and ten (10) of the copies for filing and date/time stamp the remaining copy and return it to me in the stamped, self-addressed envelope which also accompanies this letter.

Thank you for the usual courtesy.

Respectfully,

Andrew W. Bettwy

Enclosures

# INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
WILLIAM A. MUNDELL  
COMMISSIONER

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2008 NOV -9 P 1:08

ARIZONA CORPORATION COMMISSION  
STATEMENT CONTROL

IN THE MATTER OF THE JOINT )  
APPLICATION BETWEEN CITIZENS )  
UTILITIES COMPANY, INC. AND CAP )  
ROCK ENERGY CORPORATION FOR THE )  
APPROVAL OF THE SALE OF CERTAIN )  
ELECTRIC UTILITY PROPERTIES IN )  
ARIZONA AND THE TRANSFER OF THE )  
CERTIFICATE OF CONVENIENCE AND )  
NECESSITY FROM CITIZENS AND THE )  
ARIZONA ELECTRIC DIVISION TO CAP )  
ROCK ENERGY. )

DOCKET NO. E-01032A-00-0163  
E-01032B-00-0163  
E-01032C-00-0163  
E-03851A-00-0163

## APPLICATION FOR LEAVE TO INTERVENE

Pursuant to A.A.C. R14-3-105, Southwest Gas Corporation ("Southwest") respectfully applies for an order granting leave to intervene in the above-captioned proceeding.

Southwest is directly and substantially affected because (1) Southwest is a prospective customer of Citizens Utilities Company, Inc. ("Citizens") and Southwest will be an actual or a prospective customer of Cap Rock Energy Corporation ("Cap Rock") if Citizens' certificate of convenience and necessity is transferred to Cap Rock, (2) Southwest is a potential competitor with Citizens in Southwest's service territory in Mohave County, Arizona, and Southwest will be an actual or a potential competitor with Cap Rock in Southwest's service territory in Mohave County, Arizona, if Citizens' certificate of convenience and necessity is transferred to Cap Rock and (3) as a public service corporation regulated by

1 the Arizona Corporation Commission, Southwest is impacted by the  
2 determination of generic issues related to the acquisition of the  
3 properties of public service corporations.

4 The granting of Southwest's application for leave to  
5 intervene will not cause the issues to be unduly broadened.

6 Southwest requests that communications to Southwest in  
7 connection with the above-captioned proceeding be directed to:

8 Andrew W. Bettwy  
9 Assistant General Counsel  
10 Southwest Gas Corporation  
11 5241 Spring Mountain Road  
12 Las Vegas, Nevada 89102  
13 (702) 876-7107  
14 (702) 252-7283 - fax  
15 andy.bettwy@swgas.com

16 -and-

17 Debra Jacobson  
18 Senior Manager/State Regulatory Affairs  
19 Southwest Gas Corporation  
20 5241 Spring Mountain Road  
21 Las Vegas, Nevada 89102  
22 (702) 876-7163  
23 (702) 873-3820

24 RESPECTFULLY SUBMITTED this 9th day of May, 2000.

25 SOUTHWEST GAS CORPORATION

26 

27 Andrew W. Bettwy  
28 Assistant General Counsel  
5241 Spring Mountain Road  
Las Vegas, Nevada 89102  
(702) 876-7107  
(702) 252-7283 - fax  
andy.bettwy@swgas.com



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Jerry L. Rudibaugh  
Chief Hearing Officer  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007



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Andrew W. Bettwy