

ORIGINAL INTERVENTION BEFORE THE ARIZONA CORPORATION COMMISSION



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COMMISSIONERS
JEFF HATCH-MILLER - CHAIRMAN
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

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AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF) DOCKET NO. G-01551A-04-0876
SOUTHWEST GAS CORPORATION FOR A)
RATE INCREASE.)
MOTION TO INTERVENE

Tucson Electric Power Company ("TEP"), through undersigned counsel, and pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission ("Commission") for an order allowing TEP to intervene in the above captioned proceeding. In support hereof, TEP states as follows:

1. TEP is an Arizona public service corporation that provides electric service to customers within the State of Arizona.
2. TEP is directly and substantially affected by the outcome of this rate case proceeding because TEP is a major retail customer of SWG for service it receives at various generating stations. Therefore, TEP is an interested party in the determination that SWG's rates, charges and service be just and reasonable.
3. No other party can adequately represent the interests of TEP. TEP's involvement in this case will not broaden the issues of SWG's rate application, nor will it unduly prejudice SWG or any other interests.
4. Service of all correspondence, documents or pleadings should be made to counsel for TEP as follows:

Arizona Corporation Commission
DOCKETED

MAR 09 2005

DOCKETED BY

ROSHKA HEYMAN & DEWULF, PLC
ONE ARIZONA CENTER
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WHEREFORE, for all the foregoing reasons, Tucson Electric Power Company respectfully requests that the Presiding Hearing Officer issue an order granting this Motion to Intervene.

RESPECTFULLY SUBMITTED this 9th day of March 2005.

ROSHKA HEYMAN & DEWULF, PLC

By 

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1 Original and 13 copies of the foregoing
2 filed this 9th day of March 2005 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

6 Copy of the foregoing hand-delivered/mailed
7 this 9th day of March 2005 to:

7 Chairman Jeff Hatch-Miller
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