

**ORIGINAL
INTERVENTION**



0000027824

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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

8 JEFF HATCH-MILLER, CHARIMAN
9 WILLIAM A. MUNDELL
10 MARC SPITZER
11 MIKE GLEASON
12 KRISTIN K. MAYES

13 IN THE MATTER OF THE APPLICATION OF
14 ARIZONA PUBLIC SERVICE COMPANY FOR
15 A HEARING TO DETERMINE THE FAIR
16 VALUE OF THE UTILITY PROPERTY OF THE
17 COMPANY FOR RATE MAKING PURPOSES,
18 TO FIX A JUST AND REASONABLE RATE OF
19 RETURN THEREON, TO APPROVE RATE
20 SCHEDULES DESIGNED TO DEVELOP SUCH
21 RETURN, AND TO AMEND DECISION NO.
22 67744

Docket No. E-01345A-05-0816

**MOTION TO INTERVENE
OF WESTERN RESOURCE
ADVOCATES**

23 Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission
24 (Commission), Western Resource Advocates (WRA) hereby moves to intervene in the above-
25 captioned docket and, in support thereof, states as follows:

1. WRA is a regional environmental law and policy center serving the Rocky
Mountain and Desert Southwest states. WRA has been involved in proceedings before the
Commission for nearly fifteen years and has been granted intervenor status in numerous dockets.
As part of this work, WRA has represented a number of other Arizona non-profit organizations

1 on energy issues. WRA has a board member, staff and members who live and recreate in
2 Arizona and/or are APS electric ratepayers.

3 2. WRA's Energy Program promotes policies and programs designed to encourage
4 the development of clean energy power production technologies, energy efficiency, renewable
5 resources, distributed generation, and other measures that help reduce the environmental impacts
6 of meeting the demand for energy services and encourage sustainable rural economic
7 development, while minimizing the costs and risks to ratepayers of fuel price volatility and
8 environmental regulatory requirements. It has appeared in rate proceedings before the
9 Commission and in other state and federal regulatory forums to recommend, among other things,
10 improvements in rate design for sending efficient price signals and cost recovery mechanisms for
11 investments in renewable energy and energy efficiency. WRA was an intervenor in APS's last
12 rate case and was a party to the settlement agreement in that docket.

14 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.
15 WRA does not yet know what position it will take in this proceeding.

16 4. WRA requests that all pleadings, correspondence, discovery, and other documents
17 be served on the following:

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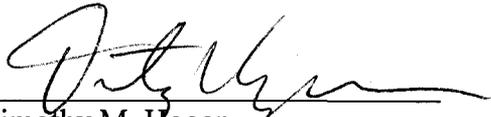
25 David Berry
26 Western Resource Advocates
27 P.O. Box 1064
28 Scottsdale, AZ 85252-1064
29 (480) 990-7209 (fax is the same)
30 azbluhill@aol.com

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3 2260 Baseline Road, Suite 200
4 Boulder, Colorado 80302
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6 fax: (303) 786-8054
7 eguidry@westernresources.org

8 Wherefore, WRA respectfully requests that the Commission issue an order granting its
9 Motion to Intervene in the above-captioned proceeding.

10 RESPECTFULLY SUBMITTED this 12th day of December, 2005.

11 ARIZONA CENTER FOR LAW IN
12 THE PUBLIC INTEREST

13 By 

14 Timothy M. Hogan
15 202 E. McDowell Rd., Suite 153
16 Phoenix, Arizona 85004
17 Attorneys for Western Resource
18 Advocates

19 ORIGINAL and 13 COPIES of
20 the foregoing filed this 12th day
21 of December, 2005, with:

22 Docketing Supervisor
23 Docket Control
24 Arizona Corporation Commission
25 1200 W. Washington
Phoenix, AZ 85007

COPIES of the foregoing
mailed this 12th day of
December, 2005 to:

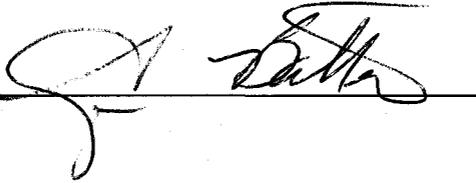
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7
8  A handwritten signature in cursive script, possibly reading "A. Latta", is written over a horizontal line. The signature is positioned between lines 7 and 8 of the document.

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