

INTERVENTION



0000028429

OPEN MEETING AGENDA ITEM

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

2005 SEP 16 A 9:54

COMMISSIONERS

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WILLIAM A. MUNDELL

MARC SPITZER

MIKE GLEASON

KRISTIN K. MAYES

AZ CORP COMMISSION
DOCUMENT CONTROL

E-01345A-03-0437

Docket No. E-01345A-05-0526

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF A POWER SUPPLY ADJUSTOR
SURCHARGE.

MOTION TO INTERVENE

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

1. UES is a subsidiary of UniSource Energy Corporation. UES, through its subsidiaries, UNS Electric, Inc. and UNS Gas, Inc., operates the Arizona electric and gas systems formerly owned by Citizens Communications.¹

2. UES was a party to the APS Rate Case, Docket No. E-01345A-03-0437. The issues raised in this docket are related to certain provisions of settlement in the APS Rate Case docket. Therefore, UES is directly and substantially affected by the issues to be addressed in this proceeding.

3. No other party could adequately represent the interests of UES. UES' involvement in this case will not broaden the issues of APS' application, nor will it unduly prejudice APS or any other interested persons.

¹ UES and UNS Electric, Inc. shall be collectively referred to hereinafter as "UES."

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1 Original and 13 copies of the foregoing
filed this 16th day of September 2005 with:

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

5 Copy of the foregoing hand-delivered/mailed
this 16th day of September 2005 to:

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By Mary Ippolito