

INTERVENTION



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ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS:

JEFF HATCH-MILLER – Chairman
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

2005 DEC -1 P 4: 33
AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE INQUIRY INTO THE)
FREQUENCY OF UNPLANNED OUTAGES)
DURING 2005 AT PALO VERDE NUCLEAR)
GENERATING STATION, THE CAUSES OF THE)
OUTAGES, THE PROCUREMENT OF)
REPLACEMENT POWER AND THE IMPACT OF)
THE OUTAGES ON ARIZONA PUBLIC)
SERVICE COMPANY'S CUSTOMERS)
)
)
)

DOCKET NO. E-01345A-05-0826

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 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.

4. Service of all correspondence, documents or pleadings should be made to counsel for UES as follows:

¹ UES, UNS Gas, Inc. and UNS Electric, Inc. shall be collectively referred to hereinafter as “UES.”

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WHEREFORE, for all the foregoing reasons, UniSource Energy Services respectfully requests that the Presiding Hearing Officer issue an order granting this Motion to Intervene.

RESPECTFULLY SUBMITTED this 1st day of December 2005.

ROSHKA DEWULF & PATTEN, PLC

By 

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1 Original and 13 copies of the foregoing
2 filed this 1st day of December 2005 with:

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

7 Copy of the foregoing hand-delivered/mailed
8 this 1st day of December 2005 to:

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