

INTERVENTION
ORIGINAL



0000035470

BEFORE THE ARIZONA CORPORATION COMMISSION

2005 DEC -11 P 4: 34

COMMISSIONERS

JEFF HATCH-MILLER - CHAIRMAN

WILLIAM A. MUNDELL

MARC SPITZER

MIKE GLEASON

KRISTIN K. MAYES

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR A
HEARING TO DETERMINE THE FAIR VALUE
OF THE UTILITY PROPERTY OF THE
COMPANY FOR RATEMAKING PURPOSES, TO
FIX A JUST AND REASONABLE RATE OF
RETURN THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP SUCH
RETURN, AND TO AMEND DECISION NO.
67744

Docket No. E-01345A-05-0816

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.

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

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

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

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

6 Michael W. Patten, Esq.
7 J. Matthew Derstine, Esq.
8 Laura E. Sixkiller, Esq.
9 Roshka DeWulf & Patten, PLC
10 One Arizona Center
11 400 East Van Buren Street, Suite 800
12 Phoenix, Arizona 85004
13 mpatten@rdp-law.com
14 jderstine@rdp-law.com
15 lsixkiller@rdp-law.com

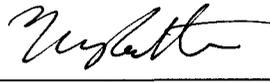
16 and

17 Michelle Livengood, Esq.
18 UniSource Energy Services
19 One South Church Street, Suite 200
20 Tucson, Arizona 85702
21 mlivengood@tep.com

22 WHEREFORE, for all the foregoing reasons, UniSource Energy Services
23 respectfully requests that the Presiding Hearing Officer issue an order granting this Motion
24 to Intervene.
25
26
27

1 RESPECTFULLY SUBMITTED this 15th day of December 2005.

2 **ROSHKA DEWULF & PATTEN, PLC**

3
4 By 

5 Michael W. Patten, Esq.
6 J. Matthew Derstine, Esq.
7 Laura Sixkiller, Esq.
8 One Arizona Center
9 400 East Van Buren Street, Suite 800
10 Phoenix, Arizona 85004
11 (602) 256-6100

12 and

13 Michelle Livengood, Esq.
14 UniSource Energy Services
15 One South Church Street, Suite 200
16 Tucson, Arizona 85702

17 Attorneys for UniSource Energy Services

18 ORIGINAL + 13 COPIES of the foregoing
19 filed this 15th day of December 2005, with:

20 Docket Control
21 ARIZONA CORPORATION COMMISSION
22 1200 West Washington
23 Phoenix, Arizona 85007

24 Copy of the foregoing mailed/hand-delivered
25 this 15th day of December 2005

26 Thomas L. Mumaw
27 Karilee S. Ramaley
Pinnacle West Capital Corp.
P. O. Box 53999
Phoenix, Arizona 85072

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 Deborah R. Scott
Kimberly A. Grouse
2 Snell & Wilmer, LLP
400 East Van Buren
3 Phoenix, Arizona 85004

4 Barbara Klemstine
Brian Brumfield
5 P. O. Box 53999
Mail Station 9708
6 Phoenix, Arizona 85072

7 Lyn A. Farmer, Esq.
Chief Administrative Law Judge
8 Hearing Division
Arizona Corporation Commission
9 1200 West Washington
Phoenix, Arizona 85007
10
11 Christopher C. Kempley
Chief Counsel, Legal Division
Arizona Corporation Commission
12 1200 West Washington
Phoenix, Arizona 85007
13
14 Ernest Johnson, Esq.
Director, Utilities Division
Arizona Corporation Commission
15 1200 West Washington
Phoenix, Arizona 85007
16

17
18 By Mary Ippolito
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22
23
24
25
26
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