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BEFORE THE ARIZONA CORPORATION



JAMES M. IRVIN  
CHAIRMAN  
RENZ D. JENNINGS  
COMMISSIONER  
CARL J. KUNASEK  
COMMISSIONER

INTERVENTION

RECEIVED  
AZ CORP COMMISSION  
Nov 5 3 19 PM '98

IN THE MATTER OF THE JOINT APPLICATION  
OF SUN CITY WATER COMPANY AND SUN  
CITY WEST UTILITIES COMPANY FOR APPROVAL  
OF CENTRAL ARIZONA PROJECT WATER UTIL-  
IZATION PLAN AND FOR AN ACCOUNTING ORDER  
AUTHORIZING A GROUNDWATER SAVINGS FEE  
AND RECOVERY OF DEFERRED CENTRAL ARIZONA  
PROJECT EXPENSES.

DOCUMENT CONTROL  
DOCKET NO.  
W-01656A-98-0577  
SW-02334A-98-0577

Arizona Corporation Commission  
DOCKETED

NOV 05 1998

APPLICATION TO INTERVENE

DOCKETED BY 

I.

Pursuant to Rule R14-3-105, the ARIZONA UTILITY INVESTORS ASSOCIATION, INC. (AUJA) hereby applies to the Arizona Corporation Commission (Commission) for an order granting it leave to intervene in the above-captioned proceeding.

II.

AUIA represents the interests of investors in electric, gas, water and telecommunications companies which are based in or are authorized to do business in the state of Arizona.

III.

AUIA's membership includes approximately six thousand individuals, including owners of the common stock of Citizens Utilities Company (Citizens), the corporate parent of the joint applicants in this proceeding.

IV.

The cash flows and profitability of Citizens and the value of debt and equity investments therein may be directly and materially affected by any order of the Commission in this matter.

V.

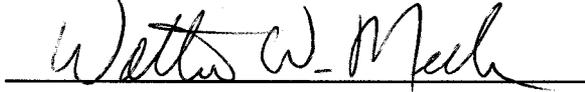
In order to represent the interests of Citizens' shareholders, AUJA must be able to examine thoroughly any materials submitted as evidence in this proceeding and to offer appropriate testimony.

VI.

The name, mailing address and telephone number of the person upon whom service is to be made is:

Walter W. Meek, President  
Arizona Utility Investors Association  
2100 N. Central Avenue, Suite 210  
Phoenix, AZ 85004  
(602) 257-9200

Respectfully Submitted, this 5th day of November, 1998.



Walter W. Meek, President

**CERTIFICATE OF SERVICE**

An original and ten copies  
of the foregoing Application  
to Intervene filed this 5th  
day of November, 1998, with:

Docket Control  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

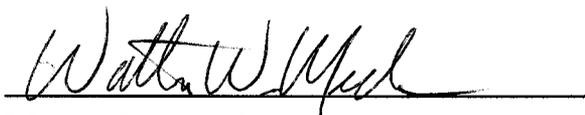
Copies of the foregoing Application  
to Intervene hand delivered this  
5th day of November, 1998, to:

Paul Bullis, Chief Counsel  
Jerry L. Rudibaugh, Chief Hearing Officer  
Ray Williamson, Acting Director, Utilities Division  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

Copies of the foregoing Application mailed  
this 5th day of November, 1998, to:

Ray Jones  
General Manager  
Sun City Water Company  
P.O. Box 1687  
Sun City, AZ 85372

Deborah R. Scott  
Senior Attorney  
Citizens Utilities Company  
2901 N. Central Ave., Suite 1660  
Phoenix, AZ 85012



Walter W. Meek