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INTERVENTION

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

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1
2 WILLIAM A. MUNDELL
CHAIRMAN
3 JIM IRVIN
COMMISSIONER
4 MARC SPITZER
COMMISSIONER
5

2002 SEP 23 P 3: 12

AZ CORP COMMISSION
DOCUMENT CONTROL

6 IN THE MATTER OF THE APPLICATION OF
7 ARIZONA PUBLIC SERVICE COMPANY
8 FOR AN ORDER OR ORDERS
9 AUTHORIZING IT TO ISSUE, INCUR, OR
10 ASSUME EVIDENCES OF LONG-TERM
11 INDEBTEDNESS; TO ACQUIRE A
FINANCIAL INTEREST OR INTERESTS IN
AN AN AFFILIATE OR AFFILIATES; TO
LEND MONEY TO AN AFFILIATES OR
AFFILIATES; AND TO GUARANTEE THE
OBLIGATIONS OF AN AFFILIATE OR
AFFILIATES

Docket No. E-01345A-02-0707

Arizona Corporation Commission
DOCKETED

SEP 23 2002

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RUCO'S APPLICATION TO INTERVENE

I.

13
14 The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the
15 Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in
16 the above-captioned proceeding.
17

II.

18 RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461,
19 *et seq.*, for the purpose of representing residential utility consumers in matters before the
20 Commission concerning regulated public service corporations.
21

III.

22 Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of
23 RUCO may do the following:
24

1 Prepare and present briefs, arguments, proposed rates or orders
2 and intervene or appear on behalf of residential utility consumers
3 before hearing officers and the Corporation Commission as a party
4 in interest and also participate as a party in interest pursuant to
5 Section 40-254 in proceedings relating to rate making or rate
6 design and involving public service corporations.

7
8 IV.

9 The residential utility consumers of Arizona Public Service Company, will be directly and
10 substantially affected by a Decision or Order of the Commission in this matter, therefore, it is
11 necessary and proper that RUCO intervene in the proceeding.

12 V.

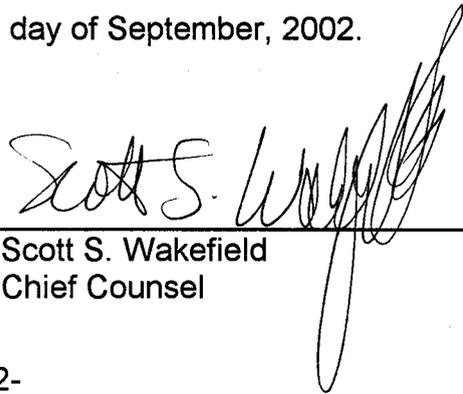
13 In order to fulfill its statutory obligation to protect the residential utility consumers of this
14 State, RUCO must thoroughly examine the materials presented by the Company, and must
15 cross-examine witnesses appearing on behalf of the Company and any other parties.
16 Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted
17 by the Commission in this matter.

18 VI.

19 The name, mailing address, and telephone number of the person upon whom service of
20 all documents is to be made is,

21
22 Scott S. Wakefield, Chief Counsel
23 Residential Utility Consumer Office
24 1110 W. Washington, Suite 220
Phoenix, Arizona 85007
(602) 364-4839

RESPECTFULLY SUBMITTED this 23rd day of September, 2002.



Scott S. Wakefield
Chief Counsel

1 AN ORIGINAL AND TEN COPIES
2 of the foregoing filed this 23rd day
of September, 2002 with:

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

6 COPIES of the foregoing hand delivered/
mailed this 23rd day of September, 2002 to:

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By Cheryl Fraulob
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