



0000048810

INTERVENTION

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

2002 SEP 27 P 4: 00

WILLIAM A. MUNDELL  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER

AZ CORP COMMISSION  
DOCUMENT CONTROL

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

Docket No. E-01345A-02-0707

Arizona Corporation Commission  
**DOCKETED**

SEP 27 2002

DOCKETED BY *CAR*

**MOTION OF PPL FOR LEAVE TO INTERVENE**

Pursuant to Arizona Administrative Code ("A.A.C.") R14-3-105, PPL Southwest Generation Holdings, LLC; PPL Energy Plus, LLC; and PPL Sundance Energy, LLC (collectively "PPL") hereby apply to the Arizona Corporation Commission (the "Commission") for an order granting PPL leave to intervene in the above-captioned proceeding. PPL currently owns and operates merchant generation facilities in Arizona, and Arizona Public Service Company ("APS") purchases wholesale generation from PPL. PPL has actively participated in each of the Commission's pending dockets concerning electric competition. PPL has a direct and substantial interest in, and will be affected by, how the commission addresses APS' requests to finance and/or guarantee obligations of its unregulated generating company affiliate Pinnacle West Energy Corporation and/or its parent company, Pinnacle West Capital Corporation.

The issues in this proceeding in which PPL has an interest are the same issues that will necessarily be examined by the Commission pursuant to its Track A Order, Decision

1 No. 65154; therefore, PPL's intervention will not broaden the proceedings.

2 PPL respectfully requests that the Commission grant its Motion for Leave to  
3 Intervene in this matter. The name, address and telephone number of the person(s) upon  
4 whom service of all documents is to be made is:

5 Jay I. Moyes  
6 Moyes Storey  
7 3003 N. Central Ave. #1250  
8 Phoenix, AZ 85012  
9 (602) 604-2106  
(602) 274-9135 (fax)  
jimoyes@lawms.com

10 Jesse A. Dillon  
11 PPL  
12 2 North Ninth Street  
13 Allentown, PA 18101  
14 (610) 774-5013  
(610) 774-6726 (fax)  
jadillon@pplweb.com

15 RESPECTFULLY SUBMITTED this 27 day of September, 2002.

16 MOYES STOREY LTD.

17   
18 \_\_\_\_\_  
19 Jay I. Moyes  
20 Moyes Storey  
21 3003 N. Central Ave. #1250  
22 Phoenix, AZ 85012

23 Jesse A. Dillon  
24 PPL  
25 2 North Ninth Street  
26 Allentown, PA 18101  
27 Attorneys for PPL  
28

1 ORIGINAL and 10 copies  
2 of the foregoing hand-delivered  
3 for filing this 27 day of  
4 September, 2002, with:

Scott Wakefield  
Residential Utility Consumer Office  
1110 W. Washington #220  
Phoenix, AZ 85007

5 Docket Control Division  
6 Arizona Corporation Commission  
7 1200 W. Washington  
8 Phoenix, AZ 85007

9 Chris Kempley, Chief Counsel  
10 Arizona Corporation Commission  
11 1200 W. Washington  
12 Phoenix, AZ 85007

13 Ernest G. Johnson  
14 Director, Utilities Division  
15 Arizona Corporation Commission  
16 1200 W. Washington  
17 Phoenix, AZ 85007

18 Lyn Farmer, Chief Administrative Law  
19 Judge  
20 Hearing Division  
21 Arizona Corporation Commission  
22 1200 W. Washington  
23 Phoenix, AZ 85007

24 Copies of the foregoing were  
25 mailed this 27 day of September 2002,  
26 to:

27 Jeffrey B. Guldner  
28 Faraz Sanei  
Snell & Wilmer  
400 E. Van Buren St.  
Phoenix, AZ 85004

Thomas Mumaw  
Senior Attorney  
Pinnacle West Capital Corporation  
P.O. Box 53999 MS 8695  
Phoenix, AZ 85072

