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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

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-02-0187

MOTION FOR LEAVE TO INTERVENE

APPLICATION OF ARIZONA COMPETITIVE POWER ALLIANCE FOR LEAVE TO INTERVENE

Pursuant to A.A.C. R14-3-105, the Arizona Competitive Power Alliance ("ACPA") hereby applies to the Arizona Corporation Commission (the "Commission") for an order granting ACPA leave to intervene in the above-captioned proceeding. The Commission should grant ACPA leave to intervene in this matter because the membership of ACPA is directly and substantially affected by these proceedings. ACPA has been an intervenor and active participant in each of the Commission's pending dockets concerning electric competition.

The financing requested by Arizona Public Service Company ("APS") on behalf of its generation affiliate, Pinnacle West Energy Corporation ("PWEC"), will have a substantial impact on the wholesale competitive market in Arizona – in particular, the competitive solicitation process currently being addressed by stakeholders in the Track B portion of the Commission's generic investigation docket. Furthermore, the Alliance membership strongly believes that the APS application seeks to mitigate any exposure its affiliates do or will have to a developing competitive market. For a proper wholesale market to develop, fair treatment of all parties is

essential, and the possibility of creating an unfair advantage for one group (APS, PWEC and PWCC) at the exclusion of others ("merchant operators") should provide sufficient reason for the hearing officer to find a substantial interest for ACPA and its members.

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

Greg Patterson
Arizona Competitive Power Alliance
5432 E. Avalon
Phoenix, AZ 85018

RESPECTFULLY SUBMITTED this 30th day of September, 2002

Greg Patterson, Director
Arizona Competitive Power Alliance
5432 E. Avalon
Phoenix, AZ 85018

ORIGINAL and 10 copies of the
foregoing hand-delivered for
filing this _30th_ day of
September, 2002, to:

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Lyn Farmer, Chief Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
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Phoenix, Arizona 85007

COPY of the foregoing mailed
this 20th day of September, 2002, to:

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