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# INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER

Arizona Corporation Commission  
**DOCKETED** AZ CORP COMMISSION  
DOCUMENT CONTROL

NOV 20 2002

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IN THE MATTER OF THE APPLICATION OF  
 THE ARIZONA ELECTRIC DIVISION OF  
 CITIZENS COMMUNICATIONS COMPANY TO  
 CHANGE THE CURRENT PURCHASED POWER  
 AND FUEL ADJUSTMENT CLAUSE RATE, TO  
 ESTABLISH A NEW PURCHASE POWER AND  
 FUEL ADJUSTMENT CLAUSE BANK, AND TO  
 REQUEST APPROVED GUIDELINES FOR THE  
 RECOVERY OF COSTS INCURRED IN  
 CONNECTION WITH ENERGY RISK  
 MANAGEMENT INITIATIVES.

DOCKET NO. E-01032C-00-0751

**MOTION TO INTERVENE**

Pursuant to Rule 14-3-105 of the Arizona Corporation Commission Rules of Practice and Procedure, UniSource Energy Corporation ("UniSource") applies to intervene in the above-captioned proceeding and states the following:

1. UniSource entered into an Asset Purchase Agreement with Citizens Communications Company ("Citizens") in which UniSource agreed to purchase Citizens' electric utility business in the State of Arizona.
2. As a result, UniSource will be directly and substantially affected by the issues raised in this docket.
3. UniSource's participation in this proceeding will not unduly broaden the nature of this proceeding and may assist in resolving the issues in this proceeding.

1 4. If UniSource is granted intervention, communications regarding this matter  
2 should be addressed to the following persons:

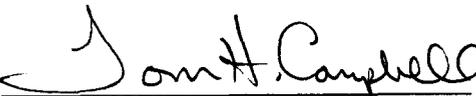
3 Thomas H. Campbell  
4 Michael T. Hallam  
5 LEWIS AND ROCA  
6 40 N. Central Avenue  
7 Phoenix, AZ 85004  
8 (602) 262-5723

Vincent Nitido  
Tucson Electric Power Company  
One South Church Avenue  
Suite 1820  
Tucson, AZ 85701  
(520) 884-3670

9 WHEREFORE, UniSource respectfully requests that the Arizona Corporation  
10 Commission issue an order granting UniSource intervention in the above-captioned  
11 proceeding.

12 RESPECTFULLY SUBMITTED this 20<sup>th</sup> day of November, 2002.

13 LEWIS AND ROCA LLP

14 

15 Thomas H. Campbell  
16 Michael T. Hallam  
17 40 N. Central Avenue  
18 Phoenix, Arizona 85004

19 - AND -

20 Vincent Nitido  
21 Tucson Electric Power Company  
22 One S. Church Avenue, Ste. 1820  
23 Tucson, Arizona 85701

24 Attorneys for UniSource Energy Corporation

25 ORIGINAL and thirteen (13) copies  
26 Of the foregoing filed this 20<sup>th</sup> day of  
November, 2002, with:

The Arizona Corporation Commission  
Utilities Division – Docket Control  
1200 W. Washington Street  
Phoenix, Arizona 85007

LEWIS  
AND  
ROCA  
LLP

LAWYERS

1 Copies of the foregoing mailed/hand-  
delivered this 20<sup>th</sup> day of November,  
2 2002, to

3 Dwight D. Nodes  
Assistant Chief Administrative Law Judge  
4 Arizona Corporation Commission  
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*Betty J. Griffin*

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