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INTERVENTION

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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Corporation Commission

DOCKETED

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DOCKET NO. G-01032A-02-0598

IN THE MATTER OF THE APPLICATION OF
CITIZENS COMMUNICATIONS COMPANY,
ARIZONA GAS DIVISION, FOR A HEARING TO
DETERMINE THE FAIR VALUE OF ITS
PROPERTIES FOR RATEMAKING PURPOSES,
TO FIX A JUST AND REASONABLE RATE OF
RETURN THEREON, AND TO APPROVE RATE
SCHEDULES DESIGNED TO PROVIDE SUCH
RATE OF RETURN.

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' gas utility business in the State of Arizona.
2. 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 or scope of this proceeding and will not delay the proceedings.
4. If UniSource is granted intervention, communications regarding this matter should be addressed to the following persons:

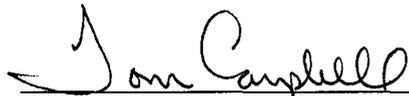
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(602) 262-5723

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

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2 WHEREFORE, UniSource respectfully requests that the Arizona Corporation
3 Commission issue an order granting UniSource intervention in the above-captioned
4 proceeding.

5 RESPECTFULLY SUBMITTED this 20th day of November, 2002.

6 LEWIS AND ROCA LLP

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9 Thomas H. Campbell
10 Michael T. Hallam
11 40 N. Central Avenue
12 Phoenix, Arizona 85004

13 - AND -

14 Vincent Nitido
15 Tucson Electric Power Company
16 One S. Church Avenue, Ste. 1820
17 Tucson, Arizona 85701

18 Attorneys for UniSource Energy Corporation

19 ORIGINAL and thirteen (13) copies
20 Of the foregoing filed this 20th day of
21 November, 2002, with:

22 The Arizona Corporation Commission
23 Utilities Division – Docket Control
24 1200 W. Washington Street
25 Phoenix, Arizona 85007

26 Copies of the foregoing mailed/hand-
delivered this 20th day of November,
2002, to

Dwight D. Nodes
Assistant Chief Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

LEWIS
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