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BEFORE THE ARIZONA CORPORATION COMMISSION

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- WILLIAM A. MUNDELL  
CHAIRMAN
- JIM IRVIN  
COMMISSIONER
- MARC SPITZER  
COMMISSIONER
- JEFF HATCH-MILLER  
COMMISSIONER
- MIKE GLEASON  
COMMISSIONER

2003 JAN -8 P 1:11  
AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF THE JOINT APPLICATION OF CITIZENS COMMUNICATIONS COMPANY AND UNISOURCE ENERGY CORPORATION FOR THE APPROVAL OF THE SALE OF CERTAIN ELECTRIC UTILITY AND GAS UTILITY ASSETS IN ARIZONA, THE TRANSFER OF CERTAIN CERTIFICATES OF CONVENIENCE AND NECESSITY FROM CITIZENS COMMUNICATIONS COMPANY TO UNISOURCE ENERGY CORPORATION, THE APPROVAL OF THE FINANCING FOR THE TRANSACTIONS AND OTHER RELATED MATTERS.

E-01933A-02-0914  
E-01032C-02-0914  
G-01032A-02-0914

Arizona Corporation Commission  
**DOCKETED**

JAN 08 2003

DOCKETED BY	<i>CR</i>
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**RUCO'S APPLICATION TO INTERVENE**

I.

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

II.

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

1 III.

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

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

10 IV.

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

14 V.

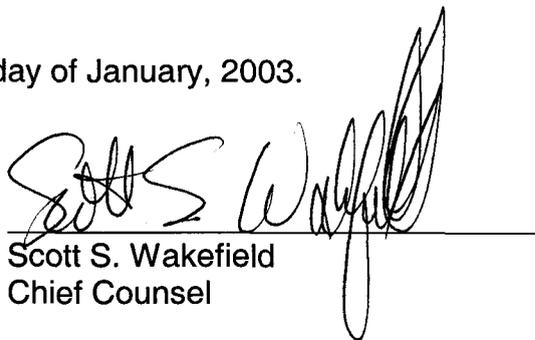
15 In order to fulfill its statutory obligation to protect the residential utility consumers of this  
16 State, RUCO must thoroughly examine the materials presented by the Company, and must  
17 cross-examine witnesses appearing on behalf of the Company and any other parties.  
18 Additionally, RUCO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

20 VI.

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

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

1 RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of January, 2003.

2  
3  
4   
5  
6 Scott S. Wakefield  
7 Chief Counsel

8 AN ORIGINAL AND THIRTEEN COPIES  
9 of the foregoing filed this 8<sup>th</sup> day  
10 of January, 2003 with:

11 Docket Control  
12 Arizona Corporation Commission  
13 1200 West Washington  
14 Phoenix, Arizona 85007

15 COPIES of the foregoing hand delivered/  
16 mailed this 8<sup>th</sup> day of January, 2003 to:

17 William A. Mundell  
18 Chairman  
19 Arizona Corporation Commission  
20 1200 West Washington  
21 Phoenix, Arizona 85007

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23 Commissioner  
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Chief Administrative Law Judge  
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Utilities Division  
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Christopher Kempley, Chief Counsel  
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Arizona Corporation Commission  
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Phoenix, Arizona 85007

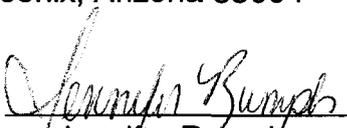
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