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MARCIA WEEKS  
CHAIRMAN  
RENZ D. JENNINGS  
COMMISSIONER  
DALE H. MORGAN  
COMMISSIONER

DOCKET NO. U-2612-91-175

IN THE MATTER OF THE  
APPLICATION OF OPERATOR  
SERVICE COMPANY FOR A NEW  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY TO PROVIDE NON-  
FACILITIES BASED INTRASTATE  
INTERLATA ALTERNATIVE  
OPERATOR SERVICE WITHIN THE  
STATE OF ARIZONA.

Arizona Corporation Commission  
DOCKETED  
JUN 03 1991

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APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE (RUCO) hereby applies to the 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 Arizona Corporation Commission relating to public service corporations regulated by the Commission.

III.

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

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

STATE OF ARIZONA  
RESIDENTIAL UTILITY CONSUMER OFFICE  
34 W. Monroe • Suite 512 • Phoenix, Arizona 85003 • 255-1431





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IV.

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

V.

In order to fulfill its statutory obligation to the residential utility consumers of this State, RUCO must thoroughly examine the materials presented by the Company, and must cross-examine any witnesses for the Company and any witnesses appearing on behalf of other intervenors. Additionally, RUCO shall present testimony and exhibits of its own in any hearings conducted by the Commission in this matter.

VI.

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

Roger A. Schwartz, Chief Counsel  
Residential Utility Consumer Office  
34 West Monroe, Suite 512  
Phoenix, Arizona 85003  
(602) 255-1431

DATED this 3rd day of June, 1991.

  
Roger A. Schwartz  
Chief Counsel, RUCO

ORIGINAL AND TEN COPIES of  
the foregoing Application to Intervene  
filed this 3rd day of June  
with the:

Docket Control Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

STATE OF ARIZONA  
RESIDENTIAL UTILITY CONSUMER OFFICE

34 W. Monroe • Suite 512 • Phoenix, Arizona 85003 • 255-1431



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COPY of the foregoing Application  
to Intervene delivered this  
3rd day of June, 1991 to:

Beth Ann Burns  
Chief Hearing Officer  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Gary Yaquinto, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Paul A. Bullis, Chief Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

COPY of the foregoing Application  
to Intervene mailed this 3rd  
day of June, 1991 to:

Peter N. Ives, Esq.  
Compton, Coryell, Hickey & Ives, P.A.  
300 Paseo de Peralta, Suite 101 (87501)  
P.O. Drawer 9730  
Santa Fe, NM 87504  
Attorney for Applicant

Andy Wilkinson, President  
Operator Service Company  
1220 Broadway, Suite 1700  
Lubbock, Texas 79401

By Cheryl Fraulob  
Cheryl Fraulob  
Legal Secretary