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INTERVENTION

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Arizona Corporation Commission

**DOCKETED**

AUG 16 2001

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AZ CORP COMMISSION  
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**BEFORE THE ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE**

13 In the matter of the Application of )  
14 ALLEGHENY ENERGY SUPPLY CO., ) Docket No. L-00000AA-01-0116  
15 L.L.C., for a Certificate of Environmental )  
16 Compatibility for construction of the LA ) **ARIZONA UNIONS FOR RELIABLE**  
17 PAZ GENERATING FACILITY, a 1,080 ) **ENERGY'S NOTICE OF INTENT TO**  
18 MW (nominal) generating facility and ) **BE A PARTY**  
19 associated transmission line and )  
20 switchyards in La Paz County, Arizona. )

21 Pursuant to A.R.S. § 40-360.05(A) and Arizona Administrative Code R14-3-  
22 204(A), ARIZONA UNIONS FOR RELIABLE ENERGY ("AZURE") hereby files  
23 notice of its intent to be a party to the above-captioned proceedings. AZURE is a  
24 coalition of labor unions whose members construct, operate, and maintain power plants  
25 throughout Arizona.

26 AZURE was formed in part to promote the economic, environmental, and personal  
health interests of its members; to promote natural resource conservation and

1 environmental protection; and to promote the orderly development of the areas in which  
2 powerplant facilities are located. Party status is therefore proper under A.R.S. § 40-  
3 360.05(A).

4 More specifically, AZURE is concerned with the sustainable economic  
5 development of Arizona's energy and natural resources. Environmental degradation  
6 jeopardizes future growth and jobs by causing construction moratoriums, depleting  
7 limited air pollutant emissions offsets, consuming limited fresh water resources, and  
8 imposing other stresses on the state's environment. Such environmental degradation in  
9 turn reduces future employment opportunities for AZURE's members. Union members  
10 also live and work in the communities and regions that will suffer the impacts of this and  
11 other projects that are detrimental to human health and the environment. Furthermore,  
12 AZURE members are concerned about projects that risk serious environmental harm  
13 without providing countervailing economic benefits. AZURE thus has a direct interest in  
14 assuring compliance with environmental laws to minimize the adverse impacts of  
15 projects that would otherwise negatively affect the interests of its members.

16 AZURE has previously submitted comments in permitting proceedings involving  
17 other power plant projects in Arizona, and intends to participate in any parallel federal,  
18 state, and/or local proceedings for the La Paz Generating Facility as well.

19 AZURE accordingly notices its intent to participate in this certification proceeding  
20 with the full rights and obligations accorded to parties pursuant to A.R.S. § 40-360, *et*  
21 *seq.*

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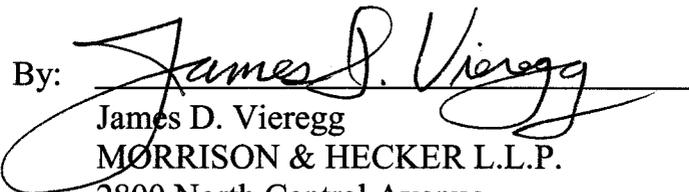
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Dated: August 16, 2001.

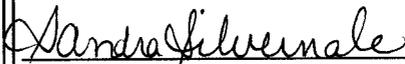
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DELIVERED for filing this 16<sup>th</sup> day of  
August, 2001, with:

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