

**ORIGINAL
INTERVENTION**



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AZ CORP COMMISSION
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Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

8 JEFF HATCH-MILLER, CHAIRMAN
9 WILLIAM A. MUNDELL
10 MIKE GLEASON
11 KRISTIN K. MAYES
12 BARRY WONG

Arizona Corporation Commission
DOCKETED

AUG 18 2006

DOCKETED BY *NR*

13 IN THE MATTER OF THE FILING OF
14 GENERAL RATE CASE INFORMATION BY
15 TUCSON ELECTRIC POWER COMPANY
16 PURSUANT TO DECISION NO. 62103

Docket No. E-01933A-05-0650

**MOTION TO INTERVENE OF
WESTERN RESOURCE
ADVOCATES**

17 Pursuant to the Rules of Practice and Procedure of the Arizona Corporation
18 Commission), Western Resource Advocates (WRA) hereby moves to intervene in the above-
19 captioned docket and, in support thereof, states as follows:

- 20 1. WRA is a regional environmental law and policy center serving the Rocky
21 Mountain and Desert Southwest states. WRA has been involved in proceedings before the
22 Commission for nearly fifteen years and has been granted intervenor status in numerous dockets.
23 As part of this work, WRA has represented a number of other Arizona non-profit organizations
24 on energy issues. WRA has a board member, staff and members who live and recreate in
25 Arizona and/or are TEP electric ratepayers.

1 2. WRA's Energy Program promotes policies and programs designed to encourage
2 the development of clean energy power production technologies, energy efficiency, renewable
3 resources, distributed generation, and other measures that help reduce the environmental impacts
4 of meeting the demand for energy services and encourage sustainable rural economic
5 development, while minimizing the costs and risks to ratepayers of fuel price volatility and
6 environmental regulatory requirements. It has appeared in rate proceedings before the
7 Commission and in other state and federal regulatory forums to recommend, among other things,
8 improvements in rate design for sending efficient price signals and cost recovery mechanisms for
9 investments in renewable energy and energy efficiency.
10

11 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.
12 WRA does not yet know what position it will take in this proceeding.

13 4. WRA requests that all pleadings, correspondence, discovery, and other documents
14 be served on the following:

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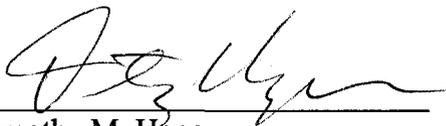
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2 Western Resource Advocates
3 2260 Baseline Road, Suite 200
4 Boulder, Colorado 80302
5 (303) 444-1188 x226
6 fax: (303) 786-8054
7 eguidry@westernresources.org

8 Wherefore, WRA respectfully requests that the Commission issue an order granting its
9 Motion to Intervene in the above-captioned proceeding.

10 RESPECTFULLY SUBMITTED this 18th day of August, 2006.

11 ARIZONA CENTER FOR LAW IN
12 THE PUBLIC INTEREST

13 By 
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17 Attorneys for Western Resource Advocates, Inc.
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1 ORIGINAL and 13 COPIES of
2 the foregoing filed this 18th day
of August, 2006, with:

3 Docketing Supervisor
4 Docket Control
5 Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

6 COPIES of the foregoing
7 electronically transmitted
8 this 18th day of August, 2006, to:

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