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INTERVENTION

ORIGINAL

RE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission  
WILLIAM A. MUNDELL **DOCKETED**  
Chairman  
JIM IRVIN **MAR 04 2002**  
Commissioner  
MARC SPITZER  
Commissioner

DOCKETED BY

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2002 MAR -4 P 3:00  
ARIZONA CORPORATION COMMISSION  
CLERK OF COURT

IN THE MATTER OF THE GENERIC PROCEEDINGS CONCERNING ELECTRIC RESTRUCTURING.

E-00000A-02-0051  
E-01345A-01-0822  
E-00000A-01-0630  
E-01933A-02-0069  
E-01933A-98-0471  
**DOCKET NO. E-01933A-02-0069**

ISSUES IN THE MATER OF TUCSON ELECTRIC POWER COMPANY'S APPLICATION FOR A VARIANCE OF CERTAIN ELECTRIC COMPETITION RULES COMPLIANCE DATES.

IN THE MATTER OF THE GENERIC PROCEEDING CONCERNING THE ARIZONA INDEPENDENT SCHEDULING ADMINISTRATOR.

**DOCKET NO. E-00000-01-0630**

Pursuant to A.A.C. R14-3-105, Southwestern Power Group, II. L.L.C., Bowie Power Station, L.L.C. and Toltec Power Station, L.L.C. (collectively, "Applicants") hereby make application for leave to intervene in the above-captioned proceeding.<sup>1</sup> This Application is supported by the following facts and information:

1. As a result of the Commission's February 8, 2002 Order consolidating Docket No. E-0345A-01-0822 with Docket Nos. E-00000A-02-0051, E-00000A-01-0630, E-01933A-02-0069 and E- 01933A-98-0417, Applicants may be directly and substantially affected by one or more

<sup>1</sup> As noted below, the instant consolidated docket also includes Commission Docket Nos. E-01345A-01-0822 and E-01933A-01-98-0471. Applicants have previously been granted intervenor status in the former proceeding. As to the latter, that docket has nothing to do with the Electric Competition Rules, and thus the Applicants do not seek intervention therein.

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1 decisions of the Commission in the above-consolidated proceedings.

2 2. Applicants' interest in the latter three proceedings mentioned above are not  
3 adequately and sufficiently represented by any party currently involved in these matters.  
4

5 3. The granting of intervenor status to Applicants will not result in delay in the  
6 proceedings or cause the issues to be resolved therein to be unduly broadened.

7 4. Copies of all notices, exhibits, pleadings and orders in these proceedings should be  
8 sent to:  
9

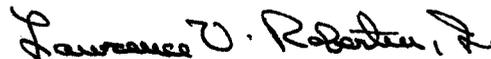
10 Lawrence V. Robertson, Jr  
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17 5. Applicants are willing to accept electronic service of all documents

18 WHEREFORE, in view of the foregoing, Applicants respectfully request that the  
19 Commission grant Applicants' Application for leave to intervene in the above-captioned  
20 proceedings, and that Applicants be accorded the full status of intervenors under the Commission's  
21 Rules of Practice and Procedure.

22 Respectfully Submitted,

23 

24 By: Lawrence V. Robertson, Jr.  
25 MUNGER HADWICK P.L.C.  
26 Attorneys for Southwestern Power Group, II L.L.C  
27  
28

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The original and ten (10) copies  
filed this 4<sup>th</sup> day of March, 2002 with:  
Docket Control  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

COPY of the foregoing mailed,  
e-mailed, faxed or hand-delivered  
this 4<sup>th</sup> day of March, 2002 to:

All parties of record

*LRQ*