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INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAMS A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

JUN 14 2002

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY *AM*

IN THE MATTER OF THE GENERIC
PROCEEDINGS CONCERNING ELECTRIC
RESTRUCTURING ISSUES.

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY'S REQUEST FOR
VARIANCE OF CERTAIN
REQUIREMENTS OF A.A.C. R14-2-1606.

Docket No. E-01345A-01-0822

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

Docket No. E-00000A-01-0630

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

Docket No. E-01933A-02-0069

IN THE MATTER OF THE APPLICATION
OF TUCSON ELECTRIC POWER
COMPANY FOR APPROVAL OF ITS
STRANDED COST RECOVERY.

Docket No. E-01933A-98-0471

MOTION TO INTERVENE

AES New Energy, Inc. ("AES NE"), pursuant to A.A.C. R14-3-105,
hereby moves to intervene in the above-captioned proceeding. In support hereof, AES
NE states as follows:

1. AES NE holds a certificate of convenience and necessity to
provide competitive services as an electric services provider. AES NE is a wholly-
owned subsidiary of the AES Corporation, a leading global power company comprised
of competitive generation, distribution and retail businesses around the world.

JONES, SKELTON & HOCHULI, P.L.C.
ATTORNEYS AT LAW
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TELEPHONE (602) 263-1700

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2. AES NE seeks to participate in these proceedings because the issues being resolved here will affect whether electric competition is viable in Arizona. These proceedings therefore directly affect AES NE's financial interest in providing competitive electric services.

3. AES NE's participation in this proceeding will not unduly broaden the nature or scope of this proceeding.

4. No other party or intervenor can represent the interests of AES NE.

5. Service of all correspondence, documents or pleadings should be made to counsel for AES NE as follows:

Daniel W. Douglass
Law Offices of Daniel W. Douglass
5959 Topanga Canyon Blvd., Suite 244
Woodland Hills, CA 91367-7313

and

Randall H. Warner
Jones Skelton & Hochuli, PLC
2901 N. Central Avenue, Suite 800
Phoenix, Arizona 85012

6. AES NE only determined that intervention was necessary when it reviewed the testimony of Tucson Electric Power Company's witnesses. Because it believes the position advocated by TEP's witnesses would be detrimental to competition, it has file rebuttal testimony and requests leave to intervene.

WHEREFORE, for the foregoing reasons, AES NE respectfully requests that the Commission issue its order granting this Motion to Intervene.

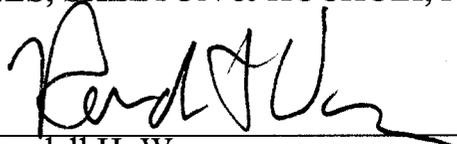
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RESPECTFULLY SUBMITTED this 14th day of June, 2002.

JONES, SKELTON & HOCHULI, P.L.C.

By 
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2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012

and

Daniel W. Douglass
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5959 Topanga Canyon Blvd., Suite 244
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Attorneys for AES New Energy, Inc.

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1 ORIGINAL and 10 COPIES filed
this 14th day of June, 2002, with:

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3 Docket Control
4 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

5 COPY of the foregoing delivered
this 14th day of June, 2002, to:

6
7 Lyn Farmer
8 Chief Administrative Law Judge
9 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

10 Christopher Kempley
11 Chief Counsel
12 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

13 Ernest G. Johnson
14 Utilities Division
15 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

16 COPY of the foregoing mailed
this 14th day of June, 2002, to:

17 All parties in ACC Docket
18 No. E-0000A-02-0051

19 M. Hawley
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