



0000070951

BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK  
COMMISSIONER-CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
TONY WEST  
COMMISSIONER

JUN 17 2 19 PM 1999

DOCUMENT CONTROL

Arizona Corporation Commission

DOCKET NO. E-010321-0014

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JUN 17 1999

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IN THE MATTER OF THE FILING BY )  
CITIZENS UTILITIES COMPANY OF )  
UNBUNDLED AND STANDARD )  
OFFER SERVICE TARIFFS PURSUANT )  
TO A.A.C. R14-2-1601 )

COMMONWEALTH'S APPLICATION FOR LEAVE TO INTERVENE

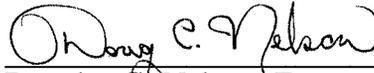
Commonwealth Energy Corporation ("Commonwealth"), through undersigned counsel, and pursuant to A.A.C. Rule 14-3-105, moves to intervene in the matter captioned above. In support of this Motion, Commonwealth states as follows:

1. Commonwealth is a California corporation active in the marketing of competitive electric services in California and desires to market competitive electric services in Arizona.
2. Commonwealth has intervened in the Arizona Electric Competition proceeding, Docket No. RE-00000C-94-0165.
3. Commonwealth will be directly and substantially affected by the decisions made in this proceeding because Commonwealth anticipates becoming an electric service provider in Arizona.
4. Commonwealth has invested considerable time and resources in the development of the California electric marketplace and it desires to sell similar competitive electric services in Arizona. Therefore, Commonwealth has a vested interest as to how electric service providers are treated under the Electric Competition Rules and in the ability of electric service providers to compete in Arizona.

For the reasons presented, Commonwealth respectfully requests that this Motion to Intervene be granted.

1 RESPECTFULLY submitted this 17<sup>th</sup> day of June, 1999.

2 DOUGLAS C. NELSON, P.C.

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5 Douglas C. Nelson, Esq.  
6 7000 North 16th Street, #120-307  
7 Phoenix, Arizona 85020  
8 Attorney on behalf of Commonwealth Energy  
9 Corporation

8 **ORIGINAL and ten copies** of the foregoing  
9 filed this 17<sup>th</sup> day of June, 1999 to:

10 Docket Control  
11 ARIZONA CORPORATION COMMISSION  
12 1200 West Washington Street  
13 Phoenix, Arizona 85007

12 **COPIES** of the foregoing hand-delivered  
13 this 17<sup>th</sup> day of June, 1999 to:

14 Jerry Rudibaugh, Chief Hearing Officer  
15 Arizona Corporation Commission  
16 1200 West Washington Street  
17 Phoenix, Arizona 85007

16 Paul Bullis  
17 Janice Alward  
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21 Phoenix, Arizona 85007

19 Ray Williamson, Acting Director  
20 Utilities Division  
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**COPIES** of the foregoing mailed  
this 1<sup>st</sup> day of June, 1999 to:

Craig A. Marks  
Associate General Counsel  
Citizens Utilities Company  
2901 N. Central Avenue, Suite 1660  
Phoenix, Arizona 85012

By *[Signature]*

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