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BEFORE THE ARIZONA CORPORATION

JAMES M. IRVIN
CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

RECEIVED
AZ CORP COMMISSION
SEP 16 4 21 PM '98



INTERVENTION
DOCKETED

SEP 16 1998

**IN THE MATTER OF THE APPLICATION
OF CITIZENS UTILITIES COMPANY
FOR APPROVAL OF ITS PLAN FOR
STRANDED COST RECOVERY.**

DOCKETED BY [Signature]
DOCKET NO.
E-01032C-98-0474

APPLICATION TO INTERVENE

I.

Pursuant to Rule R14-3-105, the ARIZONA UTILITY INVESTORS ASSOCIATION, INC. (AUIA) hereby applies to the Arizona Corporation Commission (Commission) for an order granting it leave to intervene in the above-captioned proceeding.

II.

AUIA represents the interests of investors in electric, gas, water and telecommunications companies which are based in or are authorized to do business in the state of Arizona.

III.

AUIA's membership includes approximately six thousand individuals, including owners of the common stock of Citizens Utilities Company.

IV.

The cash flows and profitability of Citizens and the value of debt and equity investments therein may be directly and materially affected by any order of the Commission in this matter.

V.

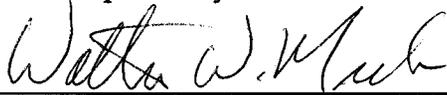
In order to represent the interests of Citizens' shareholders, AUIA must be able to examine thoroughly any materials submitted as evidence in this proceeding and to offer appropriate testimony.

VI.

The name, mailing address and telephone number of the person upon whom service is to be made is:

Walter W. Meek, President
Arizona Utility Investors Association
2100 N. Central Avenue, Suite 210
Phoenix, AZ 85004
(602) 257-9200

Respectfully Submitted, this 16th day of September, 1998.



Walter W. Meek, President

CERTIFICATE OF SERVICE

An original and ten copies of the foregoing Application to Intervene filed this 16th day of September, 1998, with:

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

Copies of the foregoing Application to Intervene hand delivered this 16th day of September, 1998, to:

Paul Bullis, Chief Counsel
Jerry L. Rudibaugh, Chief Hearing Officer
Ray Williamson, Acting Director, Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Copies of the foregoing Application mailed this 16th day of September, 1998, to all parties of record in the above-referenced Docket.



Walter W. Meek