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BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN
COMMISSIONER-CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

SEP 14 12 40 PM '98

DOCUMENT CONTROL

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

DOCKET NO. E-01032C-98-0474

INTERVENTION

RUCO'S APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission (Commission) for an Order granting it leave to intervene in the above-captioned proceeding.

II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461, et seq., for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of RUCO may do the following:

Prepare and present briefs, arguments, proposed rates or orders and intervene or appear on behalf of residential utility consumers before hearing officers and the Corporation Commission as a party in interest and also participate as a party in interest pursuant to Section 40-254 in proceedings relating to rate making or rate design and involving public service corporations.

IV.

The residential utility consumers of Citizens Utilities Company will be directly and substantially affected by a Decision or Order of the Commission in this matter, therefore, it is necessary and proper that RUCO intervene in the proceeding.

1 V.

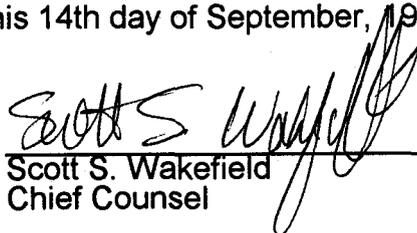
2 In order to fulfill its statutory obligation to the residential utility consumers of this State,
3 RUCO must thoroughly examine the materials presented by the Company, and must cross-
4 examine any witnesses appearing on behalf of the Company and any other parties. Additionally,
5 RUCO may present testimony and exhibits of its own in any hearings conducted by the
6 Commission in this matter.

7 VI.

8 The name, mailing address, and telephone number of the person upon whom service of
9 all documents is to be made is,

10 Scott S. Wakefield, Chief Counsel
11 Residential Utility Consumer Office
12 2828 North Central Avenue, Suite 1200
13 Phoenix, Arizona 85004
14 (602) 279-5659 ext. 349

15 RESPECTFULLY SUBMITTED this 14th day of September, 1998.

16 
17 Scott S. Wakefield
18 Chief Counsel

19 AN ORIGINAL AND TEN COPIES
20 of the foregoing filed this 14th day of
21 September, 1998 with:

22 Docket Control
23 Arizona Corporation Commission
24 1200 W. Washington
25 Phoenix, Arizona 85007

26 COPIES of the foregoing mailed/
27 hand delivered this 14th day of September, 1998
28 to the following:

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