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INTERVENTION

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AZ CORP COMMISSION
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1 Timothy M. Hogan (004567)
2 ARIZONA CENTER FOR LAW
3 IN THE PUBLIC INTEREST
4 202 E. McDowell Rd., Suite 153
5 Phoenix, Arizona 85004
6 (602) 258-8850

7 Attorneys for Western Resource Advocates

8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9 MIKE GLEASON, CHAIRMAN
10 WILLIAM A. MUNDELL
11 JEFF HATCH-MILLER
12 KRISTIN K. MAYES
13 GARY PIERCE

14 IN THE MATTER OF THE APPLICATION
15 OF ARIZONA PUBLIC SERVICE
16 COMPANY FOR APPROVAL OF
17 RENEWAL ENERGY STANDARD
18 IMPLEMENTATION PLAN, DISTRIBUTED
19 ENERGY ADMINISTRATION PLAN,
20 CUSTOMER SELF-DIRECT RENEWABLE
21 RESOURCE TARIFF, AND RESET OF
22 RENEWABLE ENERGY ADJUSTOR.

Docket No. E-01345A-07-0468

**PETITION FOR LEAVE TO
INTERVENE OF WESTERN
RESOURCE ADVOCATES**

Arizona Corporation Commission
DOCKETED

MAR 7 2008

DOCKETED BY

18 Pursuant to the Rules of Practice and Procedure of the Arizona Corporation
19 Commission (Commission), Western Resource Advocates (WRA) hereby moves to
20 intervene in the above-captioned docket and, in support thereof, states as follows:
21

22 1. WRA is a regional environmental law and policy center serving the Rocky
23 Mountain and Desert Southwest states. WRA has been involved in proceedings before
24 the Commission for nearly fifteen years and has been granted intervenor status in
25 numerous dockets. As part of this work, WRA has represented a number of other

1 Arizona non-profit organizations on energy issues. WRA has a board member, staff and
2 members who live and recreate in Arizona and/or are APS electric ratepayers.

3 2. WRA's Energy Program promotes policies and programs designed to
4 encourage the development of clean energy power production technologies, energy
5 efficiency, renewable resources, distributed generation, and other measures that help
6 reduce the environmental impacts of meeting the demand for energy services and
7 encourage sustainable rural economic development, while minimizing the costs and risks
8 to ratepayers of fuel price volatility and environmental regulatory requirements. It has
9 appeared in rate proceedings before the Commission and in other state and federal
10 regulatory forums to recommend, among other things, improvements in rate design for
11 sending efficient price signals and cost recovery mechanisms for investments in
12 renewable energy and energy efficiency.
13

14 3. Intervention by WRA will not unduly broaden the issues or delay the
15 proceeding. WRA does not yet know what position it will take in this proceeding.
16

17 4. WRA requests that all pleadings, correspondence, discovery, and other
18 documents be served on the following:
19

20 Timothy M. Hogan
21 Arizona Center for Law in the Public Interest
22 202 E. McDowell Road, Suite 153
23 Phoenix, AZ 85004
24 (602) 258-8850
25 fax (602) 258-8757

1 David Berry
2 Western Resource Advocates
3 P.O. Box 1064
4 Scottsdale, AZ 85252-1064
5 (480) 990-7209 (fax is the same)
6 azbluhill@aol.com

7 Wherefore, WRA respectfully requests that the Commission issue an order
8 granting its Motion to Intervene in the above-captioned proceeding.

9 DATED this 7th day of March, 2008

10 ARIZONA CENTER FOR LAW IN
11 THE PUBLIC INTEREST

12 By 
13 Timothy M. Hogan
14 202 E. McDowell Rd., Suite 153
15 Phoenix, Arizona 85004
16 Western Resource Advocates

17 ORIGINAL and 13 COPIES of
18 the foregoing filed this 7th day
19 of March, 2008, with:

20 Docketing Supervisor
21 Docket Control
22 Arizona Corporation Commission
23 1200 W. Washington
24 Phoenix, AZ 85007

25 COPIES of the foregoing
Electronically mailed this
7th day of March, 2008, to:

All Parties of Record

