

INTERVENTION



0000085121

BEFORE THE ARIZONA CORPORATION COMMISSION

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

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DOCUMENT CONTROL

THE GENERIC INVESTIGATION OF THE
 DEVELOPMENT OF A RENEWABLE
 PORTFOLIO STANDARD AS A PORTION OF
 THE RETAIL ELECTRIC COMPETITION
 RULES

DOCKET NO. E-00000A-99-0205

COMMONWEALTH'S APPLICATION FOR LEAVE TO INTERVENE

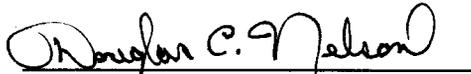
Commonwealth Energy Corporation ("Commonwealth"), through undersigned counsel, and pursuant to A.A.C. Rule 14-3-105, moves to intervene in the matter captioned above. In support of this Motion, Commonwealth states as follows:

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 28th day of May, 1999.

2 DOUGLAS C. NELSON, P.C.

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5 Douglas C. Nelson, Esq.
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Attorney on behalf of Commonwealth Energy Corporation

8 **ORIGINAL and ten copies** of the foregoing
9 filed this 28th day of May, 1999 to:

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

14 **COPIES** of the foregoing hand-delivered
15 this 28th day of May, 1999 to:

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19 Phoenix, Arizona 85007

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22 Chief Counsel - Legal Division
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24 1200 West Washington
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28 By 
29 c:\Commonwealth\Pleadings\Generic.inv