

INTERVENTION



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ORIGINAL

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AZ CORP COMMISSION
DOCKET CONTROL

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

DOCKETED

FEB 04 2009

DOCKETED BY

8 KRISTIN K. MAYES, Chairman
9 GARY PIERCE
10 PAUL NEWMAN
11 SANDRA D. KENNEDY
12 BOB STUMP

12 IN THE MATTER OF THE APPLICATION OF
13 THE SOLAR ALLIANCE FOR A
14 DECLARATORY ORDER THAT PROVIDERS
15 OF CERTAIN SOLAR SERVICE
16 AGREEMENTS WOULD NOT BE PUBLIC
17 SERVICE COPRORATIONS.

Docket No. E-20633A-08-0513

**MOTION TO INTERVENE
OF WESTERN RESOURCE
ADVOCATES**

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

21 1. WRA is a regional environmental law and policy center serving the Rocky
22 Mountain and Desert Southwest states. WRA has been involved in proceedings before the
23 Commission for nearly fifteen years and has been granted intervenor status in numerous dockets.
24 As part of this work, WRA has represented a number of other Arizona non-profit organizations
25 on energy issues. WRA has a board member, staff and members who live and recreate in
Arizona and/or are electric ratepayers.

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

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

13 4. WRA requests that all pleadings, correspondence, discovery, and other documents
14 be served on the following:

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22 David Berry
23 Western Resource Advocates
24 P.O. Box 1064
25 Scottsdale, AZ 85252-1064
 (480) 990-7209 (fax is the same)
 azbluhill@aol.com

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

1 RESPECTFULLY SUBMITTED this 4th day of February, 2009.

2 ARIZONA CENTER FOR LAW IN
3 THE PUBLIC INTEREST

4 By 
5 Timothy M. Hogan
6 202 E. McDowell Rd., Suite 153
7 Phoenix, Arizona 85004
8 Attorneys for Western Resource
9 Advocates

8 ORIGINAL and 13 COPIES of
9 the foregoing filed this 4th day
10 of February, 2009, with:

11 Docketing Supervisor
12 Docket Control
13 Arizona Corporation Commission
14 1200 W. Washington
15 Phoenix, AZ 85007

16 COPIES of the foregoing
17 electronically served this
18 4th day of February, 2009 to:

19 All Parties of Record
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21
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23
24
25