

INTERVENTION



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AZ CORP COMMISSION  
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Arizona Corporation Commission

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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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

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

DOCKET NO. E-20633A-08-0513

**MOTION TO INTERVENE OF TRICO  
ELECTRIC COOPERATIVE, INC.**

19 Trico Electric Cooperative, Inc. ("Trico", through undersigned counsel, and  
 20 pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission  
 21 ("Commission") for an order allowing Trico to intervene in the above-captioned  
 22 proceeding. In support of its motion, Trico states as follows:

23 1. Trico is an Arizona nonprofit corporation having been issued certificates of  
 24 convenience and necessity by the Commission as a public service corporation in portions  
 25 of Pima, Pinal and Santa Cruz Counties and it serves electricity to consumers in such  
 26 counties.

1           2.     In this Docket, Solar Alliance has applied for a declaratory order that  
2 providers of certain solar service agreements would not be deemed to be public service  
3 corporations.

4           3.     Trico is affected directly and substantially by the outcome of Solar Alliance's  
5 Application because members of the Solar Alliance will have solar service agreements with  
6 Trico's customers to serve electricity to such customers in Trico's certificated areas and  
7 which require interconnection with Trico's electric system. Additionally, these customers  
8 may seek incentives under the Renewable Energy Standard Rules, pursuant to R14-2-1801,  
9 *et seq.*

10          4.     The granting of intervenor status to Trico will not delay this proceeding or  
11 cause the issues to be unduly broadened, nor will it unduly prejudice Solar Alliance or any  
12 other interested parties. Trico supports solar energy and has in the past as indicated by its  
13 record.

14          5.     Service of all correspondence, documents or pleadings should be made to  
15 counsel for Trico as follows:

16                   Russell E. Jones  
17                   D. Michael Mandig  
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22           WHEREFORE, for all the foregoing reasons, Trico respectfully requests that the  
23 presiding Administrative Law Judge issue an order granting this Motion to Intervene.  
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RESPECTFULLY SUBMITTED this 16 day of February, 2009.

WATERFALL ECONOMIDIS CALDWELL  
HANSHAW & VILLAMANA, P.C.

By   
Russell E. Jones  
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**Original and 13 copies** filed this  
17 day of February, 2009, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
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**Copy** of the foregoing mailed this  
16 day of February, 2009, to:

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