

ORIGINAL

INTERVENTION



0000093864

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

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Arizona Corporation Commission

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

DOCKET NO. E-20633A-08-0513

**MOHAVE ELECTRIC COOPERATIVE
 AND NAVOPACHE ELECTRIC
 COOPERATIVE'S APPLICATION TO
 INTERVENE IN PROCEEDING**

Mohave Electric Cooperative, Inc. ("Mohave") and Navopache Electric Cooperative, Inc. ("Navopache") by and through undersigned counsel, and pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission ("Commission") for an order allowing Mohave and Navopache to intervene in the above-captioned proceeding. In support of their motion, Mohave and Navopache state as follows:

1. Mohave and Navopache are public service corporations holding a certificate of convenience and necessity to provide electric service from the Arizona Corporation Commission pursuant to A.R.S. § 40-281 *et. seq.*

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

3. Mohave and Navopache are affected directly and substantially by the outcome of Solar Alliance's Application because members of the Solar Alliance could seek solar service agreements with their customers to serve electricity to such customers in their certificated areas and which require interconnection with Mohave and Navopache electric

1 systems. Additionally, these customers may seek incentives under the Renewable Energy
2 Standard Rules, pursuant to R14-2-1801, *et seq.*

3 4. The granting of intervenor status to Mohave and Navopache will not delay this
4 proceeding or cause the issues to be unduly broadened, nor will it unduly prejudice Solar
5 Alliance or any other interested parties. Mohave and Navopache support solar energy and has
6 in the past as indicated by its record.

7 5. Intervenors requests that a copy of all communications in connection with the
8 above-captioned proceedings be directed to:

9 Michael A. Curtis
10 William P. Sullivan
11 Larry K. Udall
12 Curtis, Goodwin, Sullivan, Udall & Schwab, PLC
13 501 East Thomas Road
14 Phoenix, Arizona 85012-3205
15 mcurtis401@aol.com
16 wsullivan@cgsuslaw.com
17 ludall@cgsuslaw.com

18 RESPECTFULLY SUBMITTED this 19 day of February, 2009.

19 CURTIS, GOODWIN, SULLIVAN,
20 UDALL & SCHWAB, P.L.C.

21 By: 

22 Michael A. Curtis
23 William P. Sullivan
24 Larry K. Udall
25 501 East Thomas Road
Phoenix, Arizona 85012-3205
Attorneys for Mohave Electric
Cooperative, Inc. and Navopache Electric
Cooperative, Inc.

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PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 19th day of February, 2009, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

COPIES of the foregoing hand delivered/
mailed this 19th day of February, 2009 to:

Teena Wolfe
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Phoenix, Arizona 85007

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Janet Wagner, Assistant Chief Counsel
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Ernest G. Johnson, Director
Utilities Division
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Attorneys for Solar Alliance

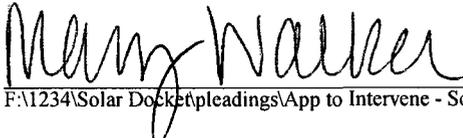
1 Deborah R. Scott
2 Linda J. Benally
3 Pinnacle West Capital Corporation
4 400 North 5th Street, M/S 8695
5 Phoenix, Arizona 85004-8695
6 Attorneys for Arizona Public Service
7 Company

8 Kenneth C. Sundlof, Jr.
9 Jennings, Strouss & Salmon, P.L.C.
10 201 E. Washington Street, 11th Floor
11 Phoenix, AZ 85004-2385

12 Kelly J. Barr
13 Salt River Project Agricultural Improvement & Power District
14 Regulatory Affairs & Contracts, PAB 221
15 P.O. Box 52025
16 Phoenix, AZ 850 72-2025

17 Timothy M. Hogan
18 Arizona Center for Law in the Public Interest
19 202 E. McDowell Road, Suite 153
20 Phoenix, AZ 85004

21 David Berry
22 Western Resource Advocates
23 P.O. Box 1064
24 Scottsdale, AZ 85252-1064

25 
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