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# INTERVENTION

18  
ORIGINAL

## BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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**CARL J. KUNASEK**

Chairman

**JIM IRVIN**

Commissioner

**WILLIAM A. MUNDELL**

Commissioner

AZ CORP COMMISSION  
DOCUMENT CONTROL

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IN THE MATTER OF NOTICE OF PROPOSED ) DOCKET NO. RG-00000A-00-0548  
 RULEMAKING REGARDING THE )  
 TRANSPORTATION OF NATURAL GAS, ) **ARIZONA FUELING FACILITIES**  
 OTHER GASES AND HAZARDOUS LIQUIDS ) **CORPORATION'S APPLICATION**  
 BY PIPELINES. ) **TO INTERVENE**  
 )

Arizona Fueling Facilities Corporation ("AFFC"), pursuant to A.A.C. R14-3-105 hereby moves to intervene in the above-captioned proceeding. In support hereof, AFFC states as follows:

1. AFFC is an Arizona corporation that owns a jet fuel pipeline and hydrant system in Arizona.

2. AFFC will be directly and substantially affected by the outcome of this docket because the amendments to the Commission's rules that are proposed in this docket, if adopted, would extend Commission jurisdiction over pipelines owned by non-public service corporations, such as AFFC.

3. AFFC's participation in this proceeding will not unduly broaden the nature or scope of this proceeding.

4. No other party or intervenor can represent the interests of AFFC's members as adequately and specifically as AFFC.

1           5.       Service of all correspondence, documents or pleadings should be made to  
2 counsel for AFFC as follows:

3                               Raymond S. Heyman, Esq.  
4                               Roshka Heyman & DeWulf  
5                               Two Arizona Center  
6                               400 N. Fifth Street, Suite 1000  
7                               Phoenix, Arizona 85004  
8                               Facsimile (602) 256-6800

9           WHEREFORE, for all of the foregoing reasons, Arizona Fueling Facilities  
10 Corporation respectfully requests that the Commission issue its order granting this Motion  
11 to Intervene.

12           RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of September, 2000.

13                               ROSHKA HEYMAN & DEWULF, PLC

14                               By Rayd S. Heyman

15                               Raymond S. Heyman  
16                               Two Arizona Center  
17                               400 North 5th Street, Suite 1000  
18                               Phoenix, Arizona 85004-3906

19                               Attorneys for Arizona Fueling Facilities  
20                               Corporation  
21  
22  
23  
24

ROSHKA HEYMAN &  
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TWO ARIZONA CENTER  
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PHOENIX, ARIZONA 85004  
TELEPHONE NO. 602-256-6100

**ROSHKA HEYMAN &  
DEWULF, PLC**

TWO ARIZONA CENTER  
400 NORTH 5TH STREET - SUITE 1000  
PHOENIX, ARIZONA 85004  
TELEPHONE NO. 602-256-6100

1 **Original and ten copies of the foregoing**  
2 **filed this 15<sup>th</sup> day of September, 2000, with:**

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 West Washington Street  
6 Phoenix, Arizona 85007

7 **Copy of the foregoing hand-delivered**  
8 **this 15<sup>th</sup> day of September, 2000 to:**

9 Jerry L. Rudibaugh, Chief Hearing Officer  
10 Hearing Division  
11 Arizona Corporation Commission  
12 1200 West Washington Street  
13 Phoenix, Arizona 85007

14 Lyn Farmer  
15 Robert Metli  
16 Legal Division  
17 Arizona Corporation Commission  
18 1200 West Washington Street  
19 Phoenix, Arizona 85007

20 Deborah Scott, Director  
21 Utilities Division  
22 Arizona Corporation Commission  
23 1200 West Washington Street  
24 Phoenix, Arizona 85007



affc/pl/motion to intervene rules