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INTERVENTION

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission
DOCKETED
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AUG 30 2000

Docket No. T-00000A-00-0194
DOCKETED BY [initials]

1
2 CARL J. KUNASEK
CHAIRMAN
3 JIM IRVIN
COMMISSIONER
4 WILLIAM A. MUNDELL
COMMISSIONER
5
6 IN THE MATTER OF INVESTIGATION
7 INTO QWEST CORPORATION'S
8 COMPLIANCE WITH CERTAIN
9 WHOLESALE PRICING REQUIREMENTS
10 FOR UNBUNDLED NETWORK
11 ELEMENTS AND RESALE DISCOUNTS.

RUCO'S APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding.

II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461, *et seq.*, for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of RUCO may do the following:

Prepare and present briefs, arguments, proposed rates or orders and intervene or appear on behalf of residential utility consumers before hearing officers and the Corporation Commission as a party in interest and also participate as a party in interest pursuant to

1 Section 40-254 in proceedings relating to rate making or rate
2 design and involving public service corporations.

3 IV.

4 The residential utility consumers of Qwest Corporation will be directly and substantially
5 affected by a Decision or Order of the Commission in this matter, therefore, it is necessary and
6 proper that RUCO intervene in the proceeding.

7 V.

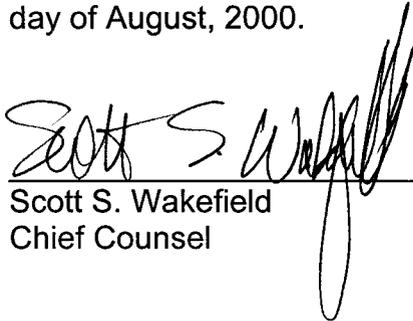
8 In order to fulfill its statutory obligation to protect the residential utility consumers of this
9 State, RUCO must thoroughly examine the materials presented by the Company, and must
10 cross-examine witnesses appearing on behalf of the Company and any other parties.
11 Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted
12 by the Commission in this matter.

13 VI.

14 The name, mailing address, and telephone number of the person upon whom service of
15 all documents is to be made is,

16 Scott S. Wakefield, Chief Counsel
17 Residential Utility Consumer Office
18 2828 North Central Avenue, Suite 1200
19 Phoenix, Arizona 85004
20 (602) 279-5659 ext. 349

21 RESPECTFULLY SUBMITTED this 30th day of August, 2000.

22 
23 _____
24 Scott S. Wakefield
Chief Counsel

1 AN ORIGINAL AND TEN COPIES
2 of the foregoing filed this 30th day of
3 August, 2000 with:

3 Docket Control
4 Arizona Corporation Commission
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6 mailed this 30th day of August, 2000 to:

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