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INTERVENTION 18

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THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

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AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE GENERIC) Docket No. E-00000A-02-0051
PROCEEDINGS CONCERNING ELECTRIC)
RESTRUCTURING ISSUES)

IN THE MATTER OF ARIZONA PUBLIC) Docket No. E-01345A-01-0822
SERVICE COMPANY'S REQUEST FOR)
VARIANCE OF CERTAIN REQUIREMENTS)
OF A.A.C. R 14-2-1606)

IN THE MATTER OF THE GENERIC) Docket No. E-00000A-01-0630
PROCEEDING CONCERNING THE)
ARIZONA INDEPENDENT SCHEDULING)
ADMINISTRATOR)

IN THE MATTER OF TUCSON ELECTRIC) Docket No. E-01933A-02-0069
POWER COMPANY'S APPLICATION FOR)
A VARIANCE OF CERTAIN ELECTRIC)
COMPETITION RULES COMPLIANCE)
DATES)

IN THE MATTER OF THE APPLICATION) Docket No. E-01933A-98-0471
OF TUCSON ELECTRIC POWER COMPANY)
FOR APPROVAL OF ITS STRANDED COST)
RECOVERY.)

MOTION OF PPL FOR LEAVE TO INTERVENE

Pursuant to Arizona Administrative Code ("A.A.C.") R14-3-105, PPL Southwest
Generation Holdings, LLC; PPL EnergyPlus, LLC; and PPL Sundance Energy, LLC
(collectively "PPL") hereby move the Commission for leave to intervene in the above-
captioned proceedings.

Arizona Corporation Commission
DOCKETED

MAR 22 2002

DOCKETED BY

1 **A. DESCRIPTION OF THE PARTIES**

2 1. **PPL EnergyPlus, LLC.** PPL EnergyPlus is a Pennsylvania limited
3 liability company and an indirect wholly-owned subsidiary of PPL Corporation. PPL
4 EnergyPlus is a power marketer authorized by the Federal Energy Regulatory Commission
5 (“FERC”) to sell energy, capacity and certain ancillary services at market-based rates,
6 including the more than 10,000 megawatts of generation owned and operated by PPL
7 Corporation affiliates, and to resell transmission rights and associated ancillary services to
8 wholesale customers. PPL EnergyPlus also sells electricity, natural gas and energy services
9 to competitively acquired retail customers in the Northeastern and Western regions of the
10 country.
11

12 2. **PPL Southwest Generation Holdings, LLC.** PPL Southwest Generation is a
13 Delaware limited liability company authorized by the FERC to sell electricity at market-
14 based rates. It is a wholly-owned direct subsidiary of PPL Generation, LLC, (“PPL
15 Generation”) which in turn is a wholly-owned indirect subsidiary of PPL Corporation, a
16 Pennsylvania corporation and a public utility holding company exempt from registration
17 under Section 3(a)(1) of PUHCA.
18

19 PPL Southwest Generation was formed for the purpose of owning an indirect 50%
20 interest in Griffith Energy LLC (“Griffith Energy”).¹ Griffith Energy is an exempt
21 wholesale generator (“EWG”) authorized by FERC to sell electricity at market-based rates.
22 Griffith Energy was formed for the purpose of owning and operating the Griffith Energy
23 Project, a gas-fired combined cycle electric generating plant located in Mohave County,
24

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26 _____
27 ¹ PPL Southwest Generation owns a 50% interest in Southwest Power Partners, LLC,
28 which in turn holds a 100% ownership interest in Griffith Energy. Duke Energy Mohave, LLC owns the remaining 50% interest in Southwest Power Partners, LLC.

1 Arizona, with a baseload capacity of approximately 500 MW and a peak capacity of
2 approximately 600 MW.

3 3. **PPL Sundance Energy, LLC.** PPL Sundance Energy is a Delaware limited
4 liability company and is currently a wholly-owned direct subsidiary of PPL Global LLC.
5 Prior to the time the Sundance Energy generating plant is synchronized with the
6 transmission grid, PPL Global LLC will transfer its interest in PPL Sundance Energy to PPL
7 Generation.
8

9 The Sundance Energy generating plant is located in Pinal County, Arizona. It is
10 expected to synchronize with the transmission grid in late April 2002 and to begin
11 commercial operation in the summer of 2002. The Sundance Energy generating plant will
12 be a simple-cycle gas-fired plant with ten turbines and will have a generating capacity of
13 450 MW. PPL Sundance Energy has filed with the FERC an application for determination
14 of status as an exempt wholesale generator and an application for market-based rate
15 authority.
16

17 **B. Interest of PPL**

18 1. PPL's existing and proposed generating facilities are interconnected to the
19 regional electric grid through the federally-owned transmission facilities pursuant to
20 interconnection and transmission service agreements with Western Area Power
21 Administration. PPL has made substantial capital investment in Arizona in reliance upon the
22 Commission's rules governing electric competition, including those specific portions of
23 such rules from which APS and TEP seek a variance through this proceeding. Through PPL
24 EnergyPlus, PPL is engaged in offering competitive energy resources to wholesale
25 purchasers, including APS and TEP, and is vitally interested in seeing a robust, competitive
26 wholesale energy market develop in Arizona. Therefore, PPL has substantial interests in the
27
28

1 outcome of this proceeding and desires to intervene in order to protect those interests.

2 2. PPL is a member of the Arizona Competitive Power Alliance and intends to
3 participate in this proceeding in coordination with the Alliance and its other members so as
4 to avoid unnecessary duplication, but feels that certain aspects of its interests may not
5 adequately be represented by the Alliance or its other members. PPL's intervention will not
6 unduly delay the proceedings or prejudice the rights of other parties.

7 3. PPL requests that all notices, correspondence and copies of orders and other
8 materials should be addressed to the undersigned.

9 WHEREFORE, for the reasons discussed above, PPL respectfully requests that it be
10 granted leave to intervene and participate as a party in this proceeding, and be accorded full
11 status of an intervenor under the Commission's rules and regulations.

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18 Phoenix, AZ 85012
19 602-604-2141
20 Attorneys for PPL

21 ORIGINAL and 10 copies
22 of the foregoing filed this
23 22 day of March, 2002, with:

24 Docket Control Division
25 Arizona Corporation Commission
26 1200 W. Washington
27 Phoenix, AZ 85007

28 Copies of the foregoing were
mailed this 22 day of March 2002
pursuant to the ACC Service list
dated February 26, 2002.

