

INTERVENTION



0000100630

ORIGINAL

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

KRISTIN K. MAYES
Chairman
GARY PIERCE
Commissioner
PAUL NEWMAN
Commissioner
SANDRA D. KENNEDY
Commissioner
BOB STUMP
Commissioner

2009 JUL 14 A 11:53

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

JUL 14 2009

DOCKETED BY 

DOCKET NO. E-20690A-09-0346

IN THE MATTER OF THE APPLICATION OF THE APPLICATION OF SOLARCITY FOR A DETERMINATION THAT WHEN IT PROVIDES SOLAR SERVICE TO ARIZONA SCHOOLS, GOVERNMENTS, AND NON-PROFIT ENTITIES IT IS NOT ACTING AS PUBLIC SERVICE CORPORATION PURSUANT TO ART. 15, SECTION 2 OF THE ARIZONA CONSTITUTION

**SALT RIVER PROJECT
AGRICULTURAL IMPROVEMENT
AND POWER DISTRICT'S
MOTION TO INTERVENE**

Salt River Project Agricultural Improvement and Power District ("SRP"), pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission for an order allowing SRP to intervene in the above-captioned proceeding. In support of its motion, SRP states as follows:

1. SRP provides electric service to customers within the State of Arizona;
2. SolarCity has applied for a declaratory order that it is not acting as a public service corporation when it provides solar service to schools, governments and non-profit entities.
3. SRP is affected directly and substantially by the outcome of SolarCity's application because SolarCity may seek to enter into solar service agreements with SRP's customers, which will require interconnection with SRP's electric system.
4. The granting of intervenor status to SRP will not delay this proceeding or cause the issues to be unduly broadened, nor will it unduly prejudice SolarCity or any other interested parties.
5. Service of all correspondence, documents or pleadings should be made

1 to as follows:

2 Kenneth C. Sundlof, Jr.
3 Jennings, Strauss & Salmon, P.L.C.
4 201 E. Washington Street, 11th Floor
5 Phoenix, AZ 85004-2385
6 602.262.5946
7 602.495.2659
8 sundlof@jsslaw.com

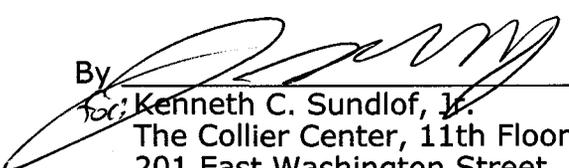
9 and

10 Kelly J. Barr
11 Salt River Project Agricultural Improvement & Power District
12 Regulatory Affairs & Contracts, PAB 221
13 P.O. Box 52025
14 Phoenix, AZ 85072-2025
15 602.236.5262
16 602.236.3458
17 Kelly.Barr@srpnet.com

18 WHEREFORE, based upon the foregoing reasons, SRP respectfully requests
19 that the presiding Administrative Law Judge issue an order granting this motion.

20 DATED this 14th day of July, 2009.

21 JENNINGS, STROUSS & SALMON, P.L.C.

22 By 

23 ~~for~~ Kenneth C. Sundlof, Jr.

24 The Collier Center, 11th Floor
25 201 East Washington Street
26 Phoenix, Arizona 85004-2385
27 Attorneys for Salt River Project
Agricultural Improvement & Power District

1 ORIGINAL and 13 copies filed this 14th
2 day of July, 2009, with:

3 Docket Control
4 ARIZONA CORPORATION COMMISSION
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7
8 COPY emailed this 14th day of
9 July, 2009, to:

10 All parties of record

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
By: 