

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DOCKET CONTROL

COMMISSIONERS
KRISTIN K. MAYES, CHAIRMAN
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

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

DOCKET NO. E-20690A-09-0346

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

Arizona Corporation Commission
DOCKETED

JUL 17 2009

DOCKETED BY

Mohave Electric Cooperative, Inc. ("Mohave") 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 to intervene in the above-
captioned proceeding. In support of its motion, Mohave states as follows:

1. Mohave is a public service corporation 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, SolarCity has applied for a declaratory order that providers of
certain solar service agreements would not be deemed to be public service corporations.

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

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

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

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

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

17 RESPECTFULLY SUBMITTED this 10 day of July, 2009.

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

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

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PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 17 day of July, 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 17 day of July, 2009 to:

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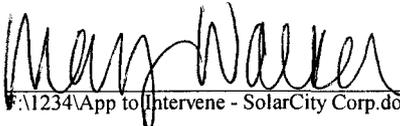
1 Deborah R. Scott
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3 Phoenix, Arizona 85004

4 Kenneth C. Sundlof, Jr.
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8 Improvement & Power District
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11 Philip J. Dion, Jr., Esq.
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13 Michael W. Patten, Esq.
14 Roshka DeWulf & Patten, PLC
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