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Arizona Cogeneration Association RECEIVED  
(d.b.a. Distributed Energy Association of Arizona)  
P.O Box 10594, Phoenix, AZ 85064 2002 MAY 31 A 10:45

AZ CORP COMMISSION  
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May 31, 2002

Nancy Cole, Supervisor  
Document Control  
Arizona Corporation Commission  
1200 W. Washington  
Division: Hearing  
Phoenix, AZ 85007

Re: Intervention in Tucson Electric Power Docket No. E-01933A-02-0345

Dear Ms. Cole:

Enclosed for filing in the above-captioned proceeding are the original and ten copies of an Application for Leave to Intervene by the Arizona Cogeneration Association.

Please let me know if you have any questions.

Sincerely,

Robert Baltes  
President  
Arizona Cogeneration Association

Enclosure

Arizona Corporation Commission  
DOCKETED

MAY 31 2002

DOCKETED BY	
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**BEFORE THE ARIZONA CORPORATION COMMISSION**

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

IN THE MATTER OF TUCSON ELECTRIC  
POWER COMPANY -  
APPLICATION FOR APPROVAL OF NEW  
PARTIAL REQUIREMENTS SERVICE  
TARIFFS, MODIFICATION OF EXISTING  
PARTIAL REQUIREMENTS SERVICE TARIFF  
101, AND ELIMINATION OF QUALIFYING  
FACILITY TARIFFS

DOCKET NO. E-01933A-02-0345

APPLICATION FOR LEAVE TO  
INTERVENE

Pursuant to Arizona Administrative Code ("A.A.C.") R14-3-105, the Arizona Cogeneration Association hereby makes application for leave to intervene in the above-captioned proceeding.

1. The purpose of the Arizona Cogeneration Association, a non-profit organization, is to encourage the production of cogeneration and small power production in Arizona in an effort to conserve natural resources and to optimize the efficient use of facilities and resources.

2. Intervention in Docket No. U-1345-95-491 (Arizona Public Service Company's Rate Reduction Agreement) and Docket No. E-01345A-01-0822 (Arizona Public Service Company's Request for a Variance of Certain Requirements of A.A.C. R14-2-1606) was granted to the Arizona Cogeneration Association. Docket No. E-01345A-01-0822 has been consolidated as a part of Docket No. E-00000A-02-0051 (In the Matter of the Generic Proceedings Concerning Electric Restructuring Issues).

3. The Arizona Cogeneration Association (d.b.a. Distributed Energy Association of Arizona) was a participant in the Distributed Generation and Interconnection Investigation Workgroup (Docket No. E-00000A-99-0431) in 1999 and 2000.

4. Cogeneration, small power production and distributed generation in Arizona will be impacted by new partial requirements service tariffs.

5. Tucson Electric Power partial requirement tariffs will be precedent setting. The Arizona Cogeneration Association anticipates that the methodology employed to justify the Tucson Electric Power Company rates will be consistent or similar with those used by other power companies. Thus, while these rates are specific to Tucson Electric Power Company customers, they will generically impact all distributed generation customers in Arizona.

6. Some of the existing Tucson Electric Power (TEP) rates were designed to be in compliance with cogeneration and small power production qualifying facilities (QFs) as defined by the code of federal regulations. Some of the rates proposed by TEP appear to be more onerous to siting generation than these existing rates.

7. The proposed rates will allow Tucson Electric Power to exercise market power in the areas of generation, distribution and transmission.

8. Intervention by the Arizona Cogeneration Association will not unduly broaden the issues or delay the proceeding.

9. The Arizona Cogeneration Association requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Robert Baltes, President AZCA  
Baltes/Valentino Associates Limited  
7250 N. 16<sup>th</sup> Street, Suite 102  
Phoenix, AZ 85020-5270  
602-371-1333  
Fax 602-371-0675  
[bbaltes@bvaeng.com](mailto:bbaltes@bvaeng.com)

WHEREFORE, the Arizona Cogeneration Association requests that the Commission issue an ordering granting intervention in the above-captioned proceedings.

Respectfully submitted this May 31, 2002.



Robert Baltes

President  
Arizona Cogeneration Association

## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the ARIZONA COGENERATION ASSOCIATION LEAVE TO INTERVENE were filed with Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007, on the 31st day of May 2002, and a true and correct copy was sent by U.S. mail, first-class and postage prepaid, to each of the following.

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