



0000112637

INTERVENTION ORIGINAL

- RECEIVED
1999 JUN 29 P 2:58

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

DOCKETED AZ CORP COMMISSION
DOCUMENT CONTROL

JUN 29 1999

1
2 CARL J. KUNASEK
CHAIRMAN
3 JIM IRVIN
COMMISSIONER
4 WILLIAM A. MUNDELL
COMMISSIONER

5	IN THE MATTER OF THE APPLICATION OF)	DOCKETED BY	<i>W</i>	
6	TUCSON ELECTRIC POWER COMPANY FOR)	DOCKET NO. E-01933A-98-0471		
7	APPROVAL OF ITS STRANDED COST)			
8	RECOVERY AND FOR RELATED APPROVALS,)			
9	AUTHORIZATIONS AND WAIVERS.)			
10	IN THE MATTER OF THE FILING OF TUCSON)	DOCKET NO. E-01933A-97-0772		
11	ELECTRIC POWER COMPANY OF UNBUNDLED)			
12	TARIFFS PURSUANT TO A.A.C. R14-2-1602)			
13	<i>et seq.</i>)			
14	IN THE MATTER OF THE COMPETITION IN)	DOCKET NO. RE-00000C-94-0165		
15	THE PROVISION OF ELECTRIC SERVICES)			
16	THROUGHOUT THE STATE OF ARIZONA.)			
17)	APPLICATIONS FOR LEAVE TO INTERVENE		

12 Pursuant to A.A.C. R14-3-105 and the Procedural Order in this docket
13 dated June 23, 1999, the Southern California Public Power Agency ("SCPPA")
14 and M-S-R Public Power Agency ("M-S-R") respectfully apply for an order
15 granting each of them leave to intervene in the above captioned proceeding.
16 In support of their Application, SCPPA and M-S-R state as follows:

17 SCPPA's principal office is located in Pasadena, California. SCPPA is
18 a public entity, created pursuant to the California joint exercise of powers
19 act. The members of SCPPA are the Department of Water and Power of the City
20 of Los Angeles, the Cities of Anaheim, Azusa, Banning, Burbank, Colton,
21 Glendale, Pasadena, Riverside and Vernon and the Imperial Irrigation
22 District. SCPPA and Tucson Electric Power Company ("TEP") are two of the
23 owners of interests in the San Juan Generating Station, a coal-fired electric
24 generating plant located near Farmington, New Mexico. SCPPA and TEP also
25 have entered into an Interconnection Agreement involving, among other things,
the use of TEP transmission facilities for delivery of San Juan Generating

1 Station power to SCPPA.

2 M-S-R, whose principal office is located in Modesto, California, is a
3 public joint exercise of powers agency duly organized and existing under the
4 laws of the State of California, whose members are the Modesto Irrigation
5 District, California, the City of Santa Clara, California and the City of
6 Redding, California. M-S-R and Tucson Electric Power Company ("TEP") are two
7 of the owners of the San Juan Generating Station ("SJGS"), a four unit coal-
8 fired electric generating plant located near Farmington, New Mexico. M-S-R
9 also owns a portion of a high voltage transmission system in Arizona. M-S-R
10 and TEP have entered into an Interconnection Agreement which provides the
11 transmission path for delivery of SJGS capacity to M-S-R's members.

12 Because of these interests, SCPPA and M-S-R submit that they have
13 direct and substantial interests in the instant proceeding. Any
14 determination by the Commission in the above-referenced docket addressing
15 this proposed settlement, including the contemplated asset transfers, may
16 directly affect the interests of SCPPA and M-S-R and such interests cannot be
17 adequately represented by any other party. SCPPA and M-S-R respectfully
18 submit that granting them intervenor status will not disrupt this ongoing
19 proceeding, especially in light of the new procedural schedule for this
20 settlement proposal. Granting SCPPA and M-S-R intervenor status will also
21 not unduly broaden the issues presented in this docket. We note that both
22 SCPPA and M-S-R have previously intervened and are parties of record both in
23 the TEP stranded cost docket and in the electric competition docket. No
24 prejudice will be placed upon existing parties as a result of these
25 interventions. The applicants request that all communications in connection
with the above-captioned proceeding be directed to:

25 / / /

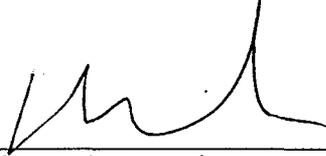
1 Robert S. Lynch
2 Attorney at Law
3 340 E. Palm Lane, Suite 140
4 Phoenix, Arizona 85004-4529
5 Phone: 602-254-5908
6 Fax: 602-257-9542
7 Email: RSLynchAty@aol.com

8 Alan Watts
9 Attorney at Law
10 Southern California Public Power Agency
11 529 Hilda Court
12 Anaheim, California 92806
13 Phone: 714-635-8885
14 Fax: 714-635-5588
15 Email: awattslaw@earthlink.net

16 Steven C. Gross, Esq.
17 Law Office of Porter·Simon
18 40200 Truckee Airport Road
19 Truckee, California 96161
20 Phone: 530-587-2002
21 Fax: 530-587-1316
22 Email: gross@portersimon.com

23 Wherefore, Southern California Public Power Agency and M-S-R Public
24 Power Agency pray that the Commission grant them both status as parties to
25 this proceeding.

RESPECTFULLY SUBMITTED this 29th day of June, 1999.

By 

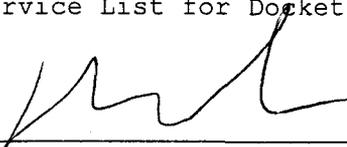
Robert S. Lynch
Attorney at Law
340 E. Palm Lane Suite 140
Phoenix, AZ 85004-4529
Attorney for Southern California
Public Power Agency and M-S-R
Public Power Agency

26 Original and 10 copies of the
27 foregoing filed this 29th day
28 of June, 1999 with:

29 Docket Control
30 Arizona Corporation Commission
31 1200 West Washington Street
32 Phoenix, Arizona

1 Copies of the foregoing mailed
2 this 29th day of June, 1999,
3 to:

4 Service List for Docket No. RE-00000C-94-0165

5 
6 _____

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25