

# INTERVENTION CITY OF TUCSON



0000112810



The Sunshine City

CITY HALL  
P.O. BOX 27210  
TUCSON, ARIZONA 85726-7210

RECEIVED  
ARIZONA CORPORATION COMMISSION

OFFICE OF  
THE  
CITY ATTORNEY  
(520) 791-4221

SEP 18 2 50 PM '98

September 18, 1998

ARIZONA CORPORATION COMMISSION  
DOCKETED

SEP 18 1998

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

DOCKETED BY 

**Re: Application to Intervene and Comments of the City of Tucson  
on the Tucson Electric Power Company Application, No. E-01933A-98-0471**

Enclosed for filing, please find the original and 10 copies of the City of Tucson's Application to Intervene and Comments of the City of Tucson on the Tucson Electric Power Company Application in Docket No. E-01933A.

Sincerely,

David Deibel  
Assistant City Attorney

DD:lr

Enclosures

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# INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION

SEP 18 2 58 PM '98  
ARIZONA CORPORATION COMMISSION  
DOCKETED

JIM IRVIN  
Commissioner - Chairman  
RENZ D. JENNINGS  
Commissioner  
CARL J. KUNASEK  
Commissioner

DOCUMENT CONTROL SEP 18 1998

DOCKETED BY 

IN THE MATTER OF THE APPLICATION OF ) DOCKET NO. E-01933A-98-0471  
TUCSON ELECTRIC POWER COMPANY )  
FOR APPROVAL OF ITS PLAN FOR ) APPLICATION TO  
STRANDED COST RECOVERY AND FOR ) INTERVENE  
RELATED APPROVALS, AUTHORIZATIONS )  
AND WAIVERS. )

The City of Tucson, by and through the undersigned attorneys, applies for intervention in the above docket pursuant to Rule 14-3-105.

The City of Tucson, as a major consumer of electric power supplied by Tucson Electric Power Company, will be directly and substantially affected by a Decision or Order of the Arizona Corporation Commission in this matter, making it necessary and proper that the City intervene in the proceeding. Further, the residents of the City will be similarly affected.

Since the City has been significantly involved in the deregulation process before the Commission, intervention in this matter is appropriate. Given the City's past involvement and its stake in the outcome of this proceeding, the City desires to examine the material submitted by Tucson Electric Power Company, cross-examine its witnesses and those of other parties, and present its own testimony, evidence and exhibits.

The name, address, and telephone number of the person upon whom service of documents is to be mailed is:

David Deibel  
Assistant City Attorney  
City Attorney's Office  
P.O. Box 27210  
Tucson, AZ 85726-7210  
(520) 791-4221

RESPECTFULLY SUBMITTED this 18th day of September, 1998.

THOMAS J. BERNING  
City Attorney

By:   
David Deibel  
Assistant City Attorney

AN ORIGINAL AND TEN COPIES  
of the foregoing hand-delivered via  
E-Z Messenger this 18th  
day of September, 1998 to:

Docket Control  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

COPIES of the foregoing mailed  
this 18th day of September, 1998 to:

Jerry Rudibaugh, Chief Hearing Officer  
Hearing Division  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

Scott S. Wakefield, Chief Counsel  
Residential Utility Consumer Office  
2828 North Central Avenue, Suite 1200  
Phoenix, AZ 85004

Bradley S. Carroll  
Council, Regulatory Affairs  
Tucson Electric Power Company  
Legal Department – DB203  
220 West Sixth Street  
P.O. Box 711  
Tucson, AZ 85702