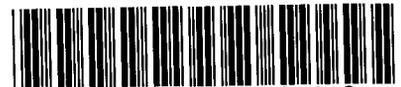


INTERVENTION



0000113010

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED
AZ CORP COMMISSION

JIM IRVIN
COMMISSIONER-CHAIRMAN
TONY WEST
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

APR 29 1993

APR 29 2 33 PM '93

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PT

DOCUMENT CONTROL

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

Pursuant to A.A.C. R14-3-105, the Southern California Public Power Agency ("SCPPA") respectfully applies for an order granting it leave to intervene in the above-captioned proceeding. In support of its Application, SCPPA states as follows: SCPPA's principal office is located in Pasadena, California. SCPPA is a public entity, created pursuant to the California joint exercise of powers act. The members of SCPPA are the Department of Water and Power of the City of Los Angeles, the Cities of Anaheim, Azusa, Banning, Burbank, Colton, Glendale, Pasadena, Riverside and Vernon and the Imperial Irrigation District. SCPPA and Tucson Electric Power Company ("TEP") are two of the owners of interests in the San Juan Generating Station, a coal-fired electric generating plant located near Farmington, New Mexico. SCPPA and TEP also have entered into an Interconnection Agreement involving, among other things, the use of TEP transmission facilities for delivery of San Juan Generating Station power to SCPPA. As such, SCPPA submits that it has a direct and substantial interest in the instant proceeding. Any determination by the Commission in the above-referenced docket addressing any aspect of electric restructuring in the State and Arizona and Tucson Electric Power Company's plan for stranded cost recovery,

1 including any proposals for asset transfers, may directly affect the
2 interests of SCPPA and such interests cannot be adequately represented by any
3 other party. SCPPA respectfully submits that granting it intervenor status
4 will not disrupt this ongoing proceeding, especially in light of the new
5 procedural schedule. Granting SCPPA intervenor status will also not unduly
6 broaden the issues presented in this docket, subject to any further action
7 upon the scope of the issues in the proceeding by virtue of Commission order.
8 No prejudice will be placed upon existing parties as a result of this
9 intervention. SCPPA will accept the record developed in this docket as of
10 the date of this Application.

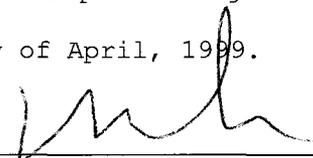
11 The Applicant requests that all communications in connection with the
12 above-captioned proceeding be directed to:

13 Robert S. Lynch
14 Attorney at Law
15 340 E. Palm Lane, Suite 140
16 Phoenix, Arizona 85004-4529
17 Phone: 602-254-5908
18 Fax: 602-257-9542
19 Email: RSLynchAty@aol.com

20 Alan Watts
21 Attorney at Law
22 Southern California Public Power Agency
23 529 Hilda Court
24 Anaheim, California 92806
25 Phone: 714-635-8885
Fax: 714-635-5588
Email: awatts@earthlink.net

Wherefore, Southern California Public Power Agency prays that the
Commission grant it status as a party to this proceeding.

RESPECTFULLY SUBMITTED this 29th day of April, 1999.

22 By 
23 Robert S. Lynch
24 Attorney at Law
25 340 E. Palm Lane, Suite 140
Phoenix, Arizona 85004-4529
Attorney for Southern
California Public Power Agency

1 Original and 10 copies of the
2 foregoing filed this 29th day
of April, 1999 with:

3 Docket Control
4 Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona

5 Copies of the foregoing hand
6 delivered/mailed this 29th day
of April, 1999, to:

7 All parties on service list of
8 Docket No. RE-00000C-94-0165

9
10  A handwritten signature in black ink, appearing to be 'M. R. ...', is written over a horizontal line. The signature is cursive and somewhat stylized.

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