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# INTERVENTION

ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION

MAR 3 8 56 AM '98

JIM IRVIN  
COMMISSIONER-CHAIRMAN  
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COMMISSIONER  
CARL J. KUNASEK  
COMMISSIONER

Arizona Corporation Commission  
DOCKETED 1345A-97-0773  
DOCUMENT CONTROL

IN THE MATTER OF THE FILING BY  
ARIZONA PUBLIC SERVICE COMPANY  
OF UNBUNDLED SERVICE TARIFFS  
PURSUANT TO A.A.C. R14-2-1606 AND  
SYSTEMS BENEFIT CHARGE  
PURSUANT TO A.A.C. R14-2-1608.

MAR 03 1998

DOCKETED BY *[Signature]*

## RUCO'S APPLICATION TO INTERVENE AND REQUEST FOR PROCEDURAL ORDER

### I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission (Commission) for an Order granting it leave to intervene in the above-captioned proceeding.

### II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461, *et seq.*, for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

### III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of RUCO may do the following:

Prepare and present briefs, arguments, proposed rates or orders and intervene or appear on behalf of residential utility consumers before hearing officers and the Corporation Commission as a party in interest and also participate as a party in interest pursuant to Section 40-254 in proceedings relating to rate making or rate design and involving public service corporations.

### IV.

The residential utility consumers of Arizona Public Service Company will be directly and substantially affected by a Decision or Order of the Commission in this matter, therefore, it is necessary and proper that RUCO intervene in the proceeding.

V.

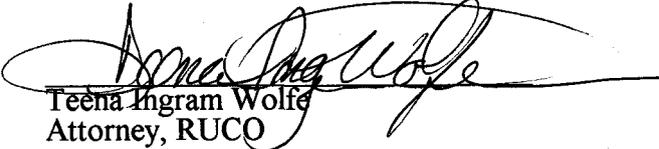
RUCO requests that the Hearing Officer issue a procedural order setting a hearing date and other procedural dates in this matter. In order to fulfill its statutory obligation to the residential utility consumers of this State, RUCO must thoroughly examine the materials presented by the Company, and must cross-examine any witnesses appearing on behalf of the Company and any other parties. Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted by the Commission in this matter.

VI.

The name, mailing address, and telephone number of the person upon whom service of all documents is to be made is,

Teena Ingram Wolfe, Attorney  
Residential Utility Consumer Office  
2828 North Central Avenue, Suite 1200  
Phoenix, Arizona 85004  
(602) 279-5659 ext. 351

RESPECTFULLY SUBMITTED this 3rd day of March, 1998.

  
Teena Ingram Wolfe  
Attorney, RUCO

AN ORIGINAL AND TEN COPIES  
of the foregoing filed this 3rd day of  
March, 1998 with:

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

COPIES of the foregoing hand  
delivered this 3rd day of March, 1998  
to the following:

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

1 Morris H. Wolffe, Director  
Utilities Division  
2 Arizona Corporation Commission  
1200 W. Washington  
3 Phoenix, Arizona 85007

4 Paul Bullis, Chief Counsel  
Legal Division  
5 Arizona Corporation Commission  
1200 W. Washington  
6 Phoenix, Arizona 85007

7 COPY of the foregoing mailed this  
3rd day of March, 1998 to:

8  
9 Thomas Mumaw  
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10 Phoenix, Arizona 85004-0001

11  
12 By *Cheryl Kraulob*  
13 Cheryl Kraulob  
Legal Secretary II

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