

INTERVENTION



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August 13, 1998

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Arizona Corporation Commission
DOCKETED

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VIA FEDEX

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

Re: Application For Leave to Intervene Out-of-Time of Shell Energy Services Company, L.L.C. In The Matter of The Competition in The Provision of Electric Services Throughout The State of Arizona, Docket No. ER-00000C-94-0165

Dear Sir or Madam:

Enclosed please find an original Application For Leave to Intervene Out-of-Time of Shell Energy Services Company, L.L.C. and 10 copies thereof in the above-referenced proceeding.

Also enclosed is an eleventh copy that I would appreciate being time-stamped and returned to me in the FedEx envelope I have provided. Please contact me with any questions at the telephone number indicated above.

Sincerely,

Stephanie A. Conaghan
for DUANE, MORRIS & HECKSCHER LLP

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INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission
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AZ CORP COMMISSION

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IN THE MATTER OF THE COMPETITION IN)
THE PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA)

AUG 14 1998

Docket No. ER-00000C-94-0165

DOCKETED BY

DOCUMENT CONTROL

**APPLICATION FOR LEAVE TO INTERVENE OUT-OF-TIME OF
SHELL ENERGY SERVICES COMPANY, L.L.C.**

Pursuant to A.A.C. R14-3-105, Shell Energy Services Company, L.L.C. ("SESCO") respectfully applies for an order granting leave to intervene out-of-time in the above-captioned proceeding. In support of its Application, SESCO states as follows:

SESCO, whose principal office is located in Houston, Texas, is a potential marketer of energy services in the State of Arizona. As such, SESCO 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 of Arizona may directly affect the interests of SESCO and such interests cannot be adequately represented by any other party.

SESCO respectfully submits that no disruption will result from granting this late intervention. In addition, no prejudice will be placed upon existing parties as a result of this late intervention. SESCO will accept the record developed in the instant docket to-date.

Communications and correspondence concerning this pleading and this proceeding should be directed to:

Andrew N. Chau
Shell Energy Services Company, L.L.C.
1221 Lamar, Suite 1000
Houston, TX 77010
Telephone: (713) 241-8939
Facsimile: (713) 241-8941

Stephen L. Teichler
Duane, Morris & Heckscher LLP
1667 K Street, NW, Suite 700
Washington, DC 20006
Telephone: (202) 776-7830
Facsimile: (202) 776-7801

Kathy T. Puckett, Senior Counsel
Shell Oil Company
200 N. Dairy Ashford
Houston, TX 77079
Telephone: (281) 544-4628
Facsimile: (281) 544-2339

WHEREFORE, Shell Energy Services Company, L.L.C. prays that the Commission grant
it status as a party to this proceeding.

Respectfully submitted,



Stephen L. Teichler
Duane, Morris & Heckscher LLP
1667 K Street, NW, Suite 700
Washington, DC 20006

Attorneys for
SHELL ENERGY SERVICES COMPANY, L.L.C.

August 13, 1998

CERTIFICATE OF SERVICE

I hereby certify that

(A) an original and ten (10) copies of the foregoing Application for Leave to Intervene Out-of-Time were filed with:

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

-- and --

(B) a copy of the foregoing Application for Leave to Intervene Out-of-Time was sent via Federal Express to:

Jerry L. Rudibaugh
Chief Hearing Officer
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Paul A. Bullis
Chief Counsel
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

-- and --

(C) a copy of the foregoing Application For Leave to Intervene Out-of-Time was served via regular U.S. mail upon each person designated on the official service list in this proceeding.

Dated at Washington, D.C., this 13th day of August, 1998.


Stephen L. Teichler