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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED
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JIM IRVIN
COMMISSIONER-CHAIRMAN
TONY WEST
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

IN THE MATTER OF THE COMPETITION IN) DOCKET NO. RE-00000C-94-0165
THE PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA)
) APPLICATION FOR LEAVE TO INTERVENE
)
)
)
)

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 revised rules for electric restructuring in the State and Arizona will affect Tucson Electric Power Company's plan for stranded cost

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

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

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

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

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