

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION

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

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

DOCKET NO. RE-00000C-94-0165

COMMONWEALTH ENERGY CORPORATION'S MOTION TO INTERVENE

Commonwealth Energy Corporation ("Commonwealth"), through undersigned counsel, and pursuant to A.A.C. Rule 14-3-105 and Rule 14-3-106.K, moves to intervene in the matter captioned above. In support of this Motion, Commonwealth states as follows:

1. Commonwealth has been actively engaged in the retail electric market of California. Commonwealth desires to become qualified and provide electric competitive services in Arizona.
2. Commonwealth Energy Corporation is licenced by the Federal Energy Regulatory Commission as a Power Marketer and is registered with the California Public Utilities Commission as an Energy Service Provider (ESP Lic. #1092). The company is Green-e certified and registered as a certified Renewable Energy Provider by the California Energy Commission.
3. Commonwealth will be directly and substantially affected by the decisions and orders of this proceeding because Commonwealth anticipates becoming an "electric service provider," pursuant to the Arizona Retail Electric Competition Rules ("the Rules").
4. Commonwealth has invested considerable time and resources in the development of the electric marketplace in the West. Therefore, Commonwealth has a vested interest as to how electric service providers are treated under the Rules and in the ability of electric service providers to compete in Arizona.
5. Commonwealth's intervention is timely in that motions to intervene have been routinely granted on an ongoing basis.

Arizona Corporation Commission

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APR 29 1999

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1 **COPIES** of the foregoing hand-delivered
2 this 29th day of April, 1999 to:

3 Jerry Rudibaugh, Chief Hearing Office
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6 Phoenix, Arizona 85007

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16 **COPIES** of the foregoing mailed
17 this 29th day of April, 1999 to:

18 Copies also mailed to:
19 Electric Competition Service List - Docket No. RE-00000C-94-0165

20 By Venus Green

21 c:\commonwealth\pleadings\intervene.mot