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INTERVENTION

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Arizona Corporation Commission

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AZ CORP COMMISSION
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Attorneys for Sierra Club-Grand Canyon Chapter

BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE, CHAIRMAN
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

IN THE MATTER OF THE APPLICATION OF
MOHAVE ELECTRIC COOPERATIVE, INC.
FOR APPROVAL OF A WASTE-TO-ENERGY
FACILITY AS A PILOT PROGRAM UNDER
THE RENEWABLE ENERGY RULES OR, IN
THE ALTERNATIVE, FOR A LIMITED
WAIVER.

Docket No. E-01750A-10-0453

PETITION FOR LEAVE TO
INTERVENE OF SIERRA CLUB -
GRAND CANYON CHAPTER

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), Sierra Club-Grand Canyon Chapter ("Sierra Club") hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

Sierra Club - Grand Canyon Chapter

1. Sierra Club is America's oldest, largest and most influential grassroots environmental organization. The Sierra Club's purpose is to explore, enjoy and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystem and resources; and to educate and enlist humanity to protect and restore the quality of the environment. The Sierra Club has nearly 800,000 members and 60 chapters, including the Grand

1 Canyon Chapter and its 14,000 members in Arizona. Its members enjoy hiking, backpacking
2 and watching wildlife on public lands in Arizona including the Kofa National Wildlife Refuge.

3 2. The Sierra Club has participated in numerous proceedings at the Commission
4 regarding energy production, renewable energy, energy efficiency and specifically including the
5 Renewable Energy Standard and Tariff Rules.

6 3. Intervention by the Sierra Club will not unduly broaden the issues or delay the
7 proceeding.

8 4. Sierra Club requests that all pleadings, correspondence, discovery, and other
9 documents be served on the following:

10 Timothy M. Hogan
11 Arizona Center for Law in the Public Interest
12 202 E. McDowell Road, Suite 153
13 Phoenix, AZ 85004
14 (602) 258-8850
15 FAX: (602) 258-8757
16 thogan@aclpi.org

17 Sandra Bahr
18 Sierra Club – Grand Canyon Chapter
19 202 E. McDowell Road, Suite 277
20 Phoenix, AZ 85004
21 (602) 253-8633
22 sandy.bahr@sierraclub.org

23 WHEREFORE, Sierra Club respectfully requests that the Commission issue an order
24 granting its Petition for Leave to Intervene in the above-captioned proceeding.
25

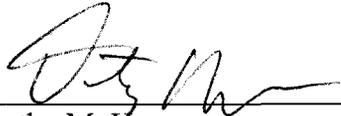
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1 DATED this 13th day of January, 2011.

2 ARIZONA CENTER FOR LAW IN
3 THE PUBLIC INTEREST

4 By 
5 Timothy M. Hogan
6 202 E. McDowell Rd., Suite 153
7 Phoenix, Arizona 85004
8 Attorneys for Sierra Club – Grand Canyon
9 Chapter

10 ORIGINAL and 13 COPIES of
11 the foregoing filed this 13th day
12 of January, 2011, with:

13 Docketing Supervisor
14 Docket Control
15 Arizona Corporation Commission
16 1200 W. Washington
17 Phoenix, AZ 85007

18 COPIES of the foregoing
19 Electronically mailed this
20 13th day of January, 2011, to:

21 All Parties of Record

22 
23 _____
24
25