

ORIGINAL  
INTERVENTION



0000123202

BEFORE THE ARIZONA CORPORATION COM.  
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ARIZONA CORPORATION COM.  
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Arizona Corporation Commission  
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FEB 17 2011

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IN THE MATTER OF THE APPLICATION OF  
ARIZONA PUBLIC SERVICE COMPANY  
FOR PROPOSED ELECTRIC VEHICLE  
READINESS DEMONSTRATION PROJECT

Docket No. E-01345A-10-0123

**RUCO'S APPLICATION TO INTERVENE**

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.

1 III.

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

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

11 IV.

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

15 V.

16 In order to fulfill its statutory obligation to protect the residential utility consumers of  
17 this State, RUCO must thoroughly examine the materials presented by the Company, and  
18 must cross-examine witnesses appearing on behalf of the Company and any other parties.  
19 Additionally, RUCO may present testimony and exhibits of its own in any hearings  
20 conducted by the Commission in this matter.

21 VI.

22 The name, mailing address, and telephone number of the person upon whom  
23 service of all documents is to be made is:  
24

1 Daniel W. Pozefsky  
2 Chief Counsel  
3 Residential Utility Consumer Office  
4 1110 West Washington, Suite 220  
5 Phoenix, Arizona 85007  
6 (602) 364-4839

7  
8 RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of February, 2011.

9  
10 

11 Daniel W. Pozefsky  
12 Chief Counsel

13 AN ORIGINAL AND THIRTEEN COPIES  
14 of the foregoing filed this 17<sup>th</sup> day  
15 of February, 2011 with:

16 Docket Control  
17 Arizona Corporation Commission  
18 1200 West Washington  
19 Phoenix, Arizona 85007

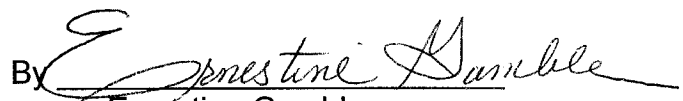
20 COPIES of the foregoing hand delivered/  
21 mailed this 17<sup>th</sup> day of February, 2011 to:

22 Lyn Farmer, Chief Administrative  
23 Law Judge  
24 Hearing Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Steven M. Olea, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Janice Alward, Chief Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Linda J. Arnold  
Deborah R. Scott  
Pinnacle West Capital Corp.  
P. O. Box 53999, Mail Station 8695  
Phoenix, AZ 85072-3999

25 By   
26 Ernestine Gamble