

INTERVENTION

ORIGINAL



0000125281

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

Arizona Corporation Commission

DOCKETED

2011 MAY 16 P 3:46

GARY PIERCE – Chairman

BOB STUMP

SANDRA D. KENNEDY

PAUL NEWMAN

BRENDA BURNS

MAY 16 2011

AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF
SOUTHWEST GAS CORPORATION FOR THE
ESTABLISHMENT OF JUST AND REASONABLE
RATES AND CHARGES DESIGNED TO
REALIZE A REASONABLE RATE OF RETURN
ON THE FAIR VALUE OF ITS PROPERTIES
THROUGHOUT ARIZONA.

Docket No. G-01551A-10-0458

**MOTION FOR LEAVE TO
INTERVENE OF NATURAL
RESOURCES DEFENSE COUNCIL**

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission

("Commission"), Natural Resources Defense Council ("NRDC") hereby moves for leave to intervene
in the above-captioned docket based on the following grounds:

1. NRDC is a non-profit public NRDC is a national environmental organization that combines
the grassroots power of 1.3 million members and online activists with the expertise of more than 350
lawyers, scientists and other professionals. NRDC uses law, science, and grassroots support to protect
the planet's wildlife and wild places and to ensure a safe and healthy environment for all living
things. NRDC tackles state-based, national and international issues through our offices in New York,
San Francisco, Santa Monica, Washington D.C., Chicago and Beijing.

2. NRDC members and supporters live in Arizona and have an interest in increased development
of energy efficiency programs and related incentives and disincentives to maximizing energy
efficiency. Thus, NRDC has a substantial interest in this proceeding because Southwest Gas'
proposal significantly impacts energy efficiency.

3. Intervention by NRDC will not unduly broaden the issues or delay this proceeding.

1 4. NRDC requests that all pleadings, correspondence, discovery and other documents be served
2 on the following:

3 Laura E. Sanchez
4 NRDC
5 PO Box 287
6 Albuquerque, NM 87103
7 (505) 352-7408 (Tel/Fax)
8 lsanchez@nrdc.org

9 Street address should be sent to:

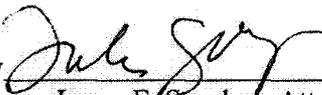
10 Laura E. Sanchez
11 NRDC
12 5736 Valle Alegre NW
13 Albuquerque, NM 87120

14 5. NRDC's counsel above is pending bar admission in Arizona, and will separately file a Motion
15 to Associate Counsel Pro Hac Vice, to request admission as counsel for NRDC in this matter.

16 WHEREFORE, NRDC respectfully requests that the Commission issue an order granting its
17 Motion for Leave to Intervene in the above-captioned proceeding.

18 RESPECTFULLY SUBMITTED this 16th day of May, 2011.

19 NATURAL RESOURCES
20 DEFENSE COUNCIL

21 By 
22 Laura E. Sanchez, Attorney
23 P.O. Box 287
24 Albuquerque, NM 87103

25 ORIGINAL Fedexed to and 14 COPIES of the
26 foregoing filed this 16th day of
27 May, 2011 to:

28 Docketing Supervisor
Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

1 COPIES of the foregoing
2 Electronically mailed this
3 16th day of May, 2011 to:

4 Debra S. Gallo
5 Southwest Gas Corporation

6 Justin Lee Brown
7 Southwest Gas Corporation

8 Daniel Pozefsky
9 RUCO

10 Michael W. Patten
11 Roshka, DeWulf & Patten, PLC
12 Tucson Electric Power Co.

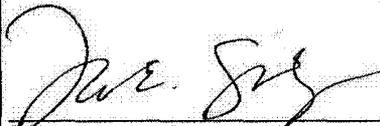
13 Timothy M. Hogan
14 Arizona Center for Law in the Public Interest
15 Southwest Energy Efficiency Project

16 Michael M. Grant
17 Arizona Investment Council

18 Cynthia Zwick

19 Janice Alward
20 Legal Division
21 Arizona Corporation Commission

22 Steve Olea
23 Director, Utilities Division
24 Arizona Corporation Commission

25 
26 _____
27 Laura E. Sanchez, Attorney for NRDC
28