

INTERVENTION



0000126839

BEFORE THE ARIZONA CORPORATION COMMISSION

DOCKETED

JIM IRVIN
COMMISSIONER-CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

DEC 15 1998

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AZ CORP COMMISSION

DOCKET NO. E-03665A-0681

IN THE MATTER OF THE APPLICATION
OF SIERRA SOUTHWEST ELECTRIC
POWER COOPERATIVE SERVICES, INC.
FOR A CERTIFICATE OF CONVENIENCE
AND NECESSITY TO PROVIDE
COMPETITIVE RETAIL ELECTRIC
SERVICES IN THE STATE OF ARIZONA.

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.

III.

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

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

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IV.

The residential utility consumers of Sierra Southwest Electric Power Cooperative Services, Inc., will be directly and substantially affected by a Decision or Order of the Commission in this matter, therefore, it is necessary and proper that RUCO intervene in the proceeding.

V.

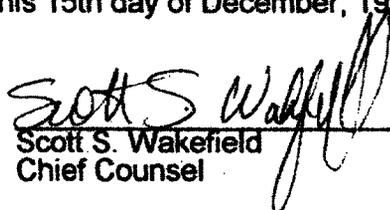
In order to fulfill its statutory obligation to protect the residential utility consumers of this State, RUCO must thoroughly examine the materials presented by the Company, and must cross-examine witnesses appearing on behalf of the Company and any other parties. Additionally, RUCO may present testimony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

VI.

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

Scott S. Wakefield, Chief Counsel
Residential Utility Consumer Office
2828 North Central Avenue, Suite 1200
Phoenix, Arizona 85004-1022
(602) 279-5659 ext. 349

RESPECTFULLY SUBMITTED this 15th day of December, 1998.



Scott S. Wakefield
Chief Counsel

AN ORIGINAL AND TEN COPIES
of the foregoing filed this 15th day of
December, 1998 with:

Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007

1 COPIES of the foregoing hand
2 delivered/mailed this 15th day of
3 December, 1998 to the following:

4 Jerry Rudibaugh, Chief Hearing Officer
5 Hearing Division
6 Arizona Corporation Commission
7 1200 W. Washington
8 Phoenix, Arizona 85007

9 Ray Williamson, Acting Director
10 Utilities Division
11 Arizona Corporation Commission
12 1200 W. Washington
13 Phoenix, Arizona 85007

14 Paul Bullis, Chief Counsel
15 Legal Division
16 Arizona Corporation Commission
17 1200 W. Washington
18 Phoenix, Arizona 85007

19 Michael Grant
20 Gallagher & Kennedy
21 2600 North Central Avenue
22 Phoenix, Arizona 85004-3020
23 Attorneys for Sierra Southwest Electric
24 Power Cooperative Services, Inc.

25 Patricia Cooper, Corporate Counsel
26 AEPCO/SSWEPCO
27 1000 South Highway 80
28 Benson, Arizona 85602

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

20 By Cheryl Fraulob
21 Cheryl Fraulob
22 Legal Secretary
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25
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