

ORIGINAL

INTERVENTION



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AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

AUG 23 2011

Attorneys for Western Resource Advocates

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BEFORE THE ARIZONA CORPORATION COMMISSION

8 GARY PIERCE, Chairman
9 BOB STUMP
10 SANDRA KENNEDY
11 PAUL NEWMAN
12 BRENDA BURNS

11 IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. E-01345A-11-0264
12 ARIZONA PUBLIC SERVICE COMPANY FOR)	
13 APPROVAL OF ITS 2012 RENEWABLE)	MOTION TO INTERVENE
14 ENERGY STANDARD IMPLEMENTATION)	OF WESTERN RESOURCE
15 PLAN AND REQUEST FOR RESET OF)	ADVOCATES
16 RENEWABLE ENERGY ADJUSTOR.)	

17 Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission
18 (“Commission”), Western Resource Advocates (“WRA”) hereby moves to intervene in the
19 above-captioned docket and, in support thereof, states as follows:

20 1. WRA is a regional environmental law and policy center serving the Rocky
21 Mountain and Desert Southwest states. WRA has been involved in proceedings before the
22 Commission since about 1990 and has been granted intervenor status in numerous dockets. It
23 also participated in the rulemaking docket regarding adoption of the Renewable Energy Standard
24 and Tariff Rules. WRA has staff members and multiple supporters who live and recreate in
25 Arizona and/or are APS electric ratepayers.

1 2. WRA's Energy Program promotes policies and programs designed to encourage
2 the development of clean energy power production technologies, energy efficiency, renewable
3 resources, distributed generation, and other measures that help reduce the environmental impacts
4 of meeting the demand for energy services and encourage sustainable rural economic
5 development, while minimizing the costs and risks to ratepayers of fuel price volatility and
6 environmental regulatory requirements. It has appeared in proceedings before the Commission
7 and in other state and federal regulatory forums to recommend, among other things,
8 improvements in rate design for sending efficient price signals and cost recovery mechanisms for
9 investments in renewable energy and energy efficiency.

10 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.

11 4. WRA requests that all pleadings, correspondence, discovery and other documents
12 be served on the following:

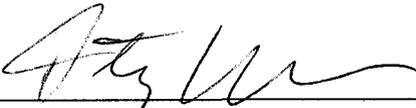
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21 Western Resource Advocates
22 P. O. Box 1064
23 Scottsdale, Arizona 85252-1064
24 (480) 990-7209 (fax is the same)
25 azbluhill@aol.com

WHEREFORE, WRA respectfully requests that the Commission issue an order granting
its Motion to Intervene in the above-captioned proceeding.

1 DATED this 23rd day of August, 2011.

2 ARIZONA CENTER FOR LAW IN
3 THE PUBLIC INTEREST

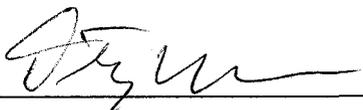
4 By 
5 Timothy M. Hogan
6 202 E. McDowell Rd., Suite 153
7 Phoenix, Arizona 85004
8 Attorneys for Western Resource
9 Advocates

10 ORIGINAL and 13 COPIES of
11 the foregoing filed this 23rd day
12 of August, 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 23rd day of August, 2011 to:

21 All Parties of Record

22 
23 _____