

ORIGINAL

INTERVENTION



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AZ CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

AUG 23 2011

DOCKETED BY

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE, Chairman
BOB STUMP
SANDRA KENNEDY
PAUL NEWMAN
BRENDA BURNS

IN THE MATTER OF THE APPLICATION OF)
TUCSON ELECTRIC POWER COMPANY FOR)
APPROVAL OF ITS 2012 RENEWABLE)
ENERGY STANDARD IMPLEMENTATION)
PLAN AND DISTRIBUTED ENERGY)
ADMINISTRATIVE PLAN AND REQUEST)
FOR RENEWABLE ENERGY ADJUSTOR.)

DOCKET NO. E-01933A-11-0269

**MOTION TO INTERVENE
OF WESTERN RESOURCE
ADVOCATES**

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

1. WRA is a regional environmental law and policy center serving the Rocky Mountain and Desert Southwest states. WRA has been involved in proceedings before the Commission since about 1990 and has been granted intervenor status in numerous dockets. It also participated in the rulemaking docket regarding adoption of the Renewable Energy Standard

1 and Tariff Rules. WRA has staff members and multiple supporters who live and recreate in
2 Arizona and/or are TEP electric ratepayers.

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

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

13 4. WRA requests that all pleadings, correspondence, discovery and other documents
14 be served on the following:
15

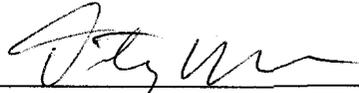
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24 WHEREFORE, WRA respectfully requests that the Commission issue an order granting
25 its Motion to Intervene in the above-captioned proceeding.

1 DATED this 23rd day of August, 2011.

2 ARIZONA CENTER FOR LAW IN
3 THE PUBLIC INTEREST

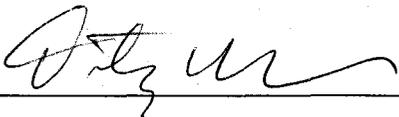
4 By 
5 Timothy M. Hogan
6 202 E. McDowell Rd., Suite 153
7 Phoenix, Arizona 85004
8 Attorneys for Western Resource
9 Advocates

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
24
25