

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

DOCKET CONTROL

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AUG 31 2011

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Docket No. E-01933A-11-0269

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 RESET OF RENEWABLE ENERGY
ADJUSTOR.

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.

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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.

IV.

The residential utility consumers 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:

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

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10 RESPECTFULLY SUBMITTED this 31st day of August, 2011.

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Daniel W. Pozefsky
Chief Counsel

10 AN ORIGINAL AND THIRTEEN COPIES
11 of the foregoing filed this 31st day
12 of August, 2011 with:

12 Docket Control
13 Arizona Corporation Commission
14 1200 West Washington
15 Phoenix, Arizona 85007

16 COPIES of the foregoing hand delivered/
17 mailed this 31st day of August, 2011 to:

18 Teena Jibilian, Administrative
19 Law Judge
20 Hearing Division
21 Arizona Corporation Commission
22 1200 West Washington
23 Phoenix, Arizona 85007

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

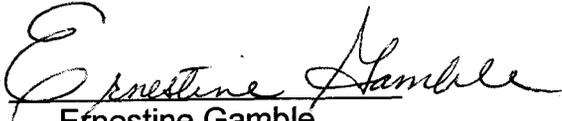
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8 By 
Ernestine Gamble

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