

# INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

DOCKETED

AUG 31 2011

DOCKETED BY

GARY PIERCE  
CHAIRMAN  
BOB STUMP  
COMMISSIONER  
SANDRA D. KENNEDY  
COMMISSIONER  
PAUL NEWMAN  
COMMISSIONER  
BRENDA BURNS  
COMMISSIONER

IN THE MATTER OF THE APPLICATION OF  
UNS ELECTRIC, INC. FOR APPROVAL OF  
ITS 2012 RENEWABLE ENERGY  
STANDARD IMPLEMENTATION PLAN AND  
DISTRIBUTED ENERGY ADMINISTRATIVE  
PLAN AND REQUEST FOR RESET OF  
RENEWABLE ENERGY ADJUSTOR.

Docket No. E-04204A-11-0267

## 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.

1 III.

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

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

11 IV.

12 The residential utility consumers will be directly and substantially affected by a  
13 Decision or Order of the Commission in this matter, therefore, it is necessary and proper  
14 that RUCO intervene in the proceeding.

15 V.

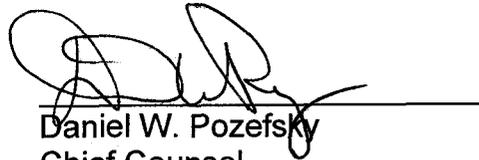
16 In order to fulfill its statutory obligation to protect the residential utility consumers of  
17 this State, RUCO must thoroughly examine the materials presented by the Company, and  
18 must cross-examine witnesses appearing on behalf of the Company and any other parties.  
19 Additionally, RUCO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

21 VI.

22 The name, mailing address, and telephone number of the person upon whom  
23 service of all documents is to be made is:  
24

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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9  
10 RESPECTFULLY SUBMITTED this 31<sup>st</sup> 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 31<sup>st</sup> 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 31<sup>st</sup> 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  
Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Steven M. Olea, Director  
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By *Ernestine Gamble*  
Ernestine Gamble