

ORIGINAL

INTERVENTION



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**BEFORE THE ARIZONA CORPORATION COMMISSION**

COMMISSIONERS

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

SEP 18 P 4: 32  
ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission  
**DOCKETED**  
SEP 18 2012

DOCKETED BY *JM*

IN THE MATTER OF THE APPLICATION OF  
TUCSON ELECTRIC POWER COMPANY FOR  
THE ESTABLISHMENT OF JUST AND  
REASONABLE RATES AND CHARGES  
DESIGNED TO REALIZE A REASONABLE RATE  
OF RETURN ON THE FAIR VALUE OF ITS  
OPERATIONS THROUGHOUT THE STATE OF  
ARIZONA.

Docket No. E-01933A-12-0291

**MOTION TO INTERVENE**

GALLAGHER & KENNEDY, P.A.  
2575 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000

Pursuant to A.A.C. R14-3-105, the Arizona Investment Council ("AIC") applies to the Commission for an Order granting it leave to intervene in this proceeding. In support of its Motion, the AIC states as follows:

1. AIC's missions include the promotion of policies which encourage utility investment and infrastructure development in Arizona, as well as to represent the interests of debt and equity investors in Arizona utilities. AIC's nearly 6,000 members include Arizona utility service providers and individuals who hold stock or debt instruments in these utilities.

2. AIC and its members have a substantial interest in this proceeding. The rates and level of earnings the Commission authorizes for Tucson Electric Power Company impact present, as well as prospective, debt and equity investors. The Commission's decision on this case also sends important signals to capital markets concerning Arizona's regulatory attitude regarding utility investment and required infrastructure development and/or improvement.

1           3.     No other party can adequately represent the interests of AIC's members in this  
2 docket. Its participation will not unduly broaden the issues presented.

3           4.     Service of all correspondence, pleadings and other documents should be made to  
4 the following:

5                   Michael M. Grant  
6                   Gallagher & Kennedy, P.A.  
7                   2575 East Camelback Road  
8                   Phoenix, Arizona 85016-9225  
9                   Email: [mmg@gknet.com](mailto:mmg@gknet.com)

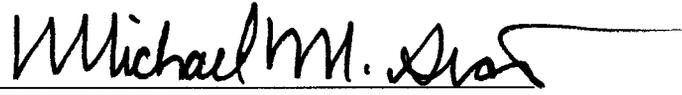
10                   with a copy to:

11                   Gary Yaquinto, President & CEO  
12                   Arizona Investment Council  
13                   2100 North Central Avenue, Suite 210  
14                   Phoenix, Arizona 85004  
15                   Email: [gyaquinto@arizonaic.org](mailto:gyaquinto@arizonaic.org)

16                   WHEREFORE, AIC requests that the Administrative Law Judge issue an order granting  
17 its Motion to Intervene.

18                   RESPECTFULLY SUBMITTED this 18<sup>th</sup> day of September, 2012.

19                   GALLAGHER & KENNEDY, P.A.

20                   By   
21                   Michael M. Grant  
22                   2575 East Camelback Road  
23                   Phoenix, Arizona 85016-9225  
24                   Attorneys for Arizona Investment Council

25                   **Original and 13 copies** filed this  
26                   18<sup>th</sup> day of September, 2012, with:  
27                   Docket Control  
28                   Arizona Corporation Commission  
29                   1200 West Washington Street  
30                   Phoenix, Arizona 85007

1 **Copies** of the foregoing delivered  
this 18<sup>th</sup> day of September, 2012, to:

2 Janice Alward, Chief Counsel  
3 Legal Division  
4 Arizona Corporation Commission  
5 1200 West Washington Street  
6 Phoenix, Arizona 85007

7 Steve Olea, Director  
8 Utilities Division  
9 Arizona Corporation Commission  
10 1200 West Washington Street  
11 Phoenix, Arizona 85007

12 **Copies** of the foregoing mailed  
this 18<sup>th</sup> day of September, 2012, to:

13 Jane L. Rodda  
14 Administrative Law Judge  
15 Arizona Corporation Commission  
16 Hearing Division  
17 400 West Congress  
18 Tucson, Arizona 85701-1347

19 Bradley S. Carroll  
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21 P.O. Box 711  
22 Tucson, Arizona 85702

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