

ORIGINAL

INTERVENTION



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Arizona Corporation Commission

AZ CORP COMMISSION  
DOCKET CONTROL

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JAN 28 2013

7 Attorneys for Western Resource Advocates

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8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9 BOB STUMP, Chairman  
10 GARY PIERCE  
11 BRENDA BURNS  
12 BOB BURNS  
13 SUSAN BITTER SMITH

Docket No. E-01933A-12-0296

14 IN THE MATTER OF THE APPLICATION  
15 OF TUCSON ELECTRIC POWER  
16 COMPANY FOR APROVAL OF ITS 2013  
17 RENEWABLE ENERGY STANDARD  
18 IMPLEMENTATION PLAN AND  
19 DISTRIBUTED ENERGY  
20 ADMINISTRATIVE PLAN AND REQUEST  
21 FOR RESET OF ITS RENEWABLE  
22 ENERGY ADJUSTOR.

**PETITION FOR LEAVE TO  
INTERVENE OF WESTERN  
RESOURCE ADVOCATES**

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

- 26 1. In its Open Meeting on January 23, 2013, the Commission directed the  
27 Hearing Division to conduct a hearing on several matters concerning the Renewable  
28 Energy Standard including the treatment of renewable energy credits.

1           2.       WRA is a regional environmental law and policy center serving the Rocky  
2 Mountain and Desert Southwest states. WRA has been involved in proceedings before  
3 the Commission since 1990 and has been granted intervenor status in numerous dockets.

4  
5           3.       WRA's Energy Program promotes policies and programs designed to  
6 encourage the development of clean energy power production technologies, energy  
7 efficiency, renewable resources, distributed generation, and other measures that help  
8 reduce the environmental impacts of meeting the demand for energy services, while  
9 minimizing the costs and risks to ratepayers of fuel price volatility and environmental  
10 regulatory requirements. WRA was an active participant in the docket leading to the  
11 adoption of the Renewable Energy Standard and Tariff rules and has submitted comments  
12 in the current docket.  
13

14           4.       WRA plans to participate in the hearing ordered in this docket by the  
15 Commission at its Open Meeting on January 23, 2013.

16           5.       Intervention by WRA will not unduly broaden the issues or delay the  
17 proceeding. WRA does not yet know what position it will take in this proceeding.  
18

19           6.       WRA requests that all pleadings, correspondence, discovery, and other  
20 documents be served on the following:

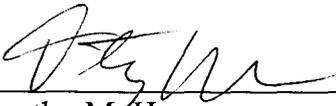
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2 Western Resource Advocates  
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4 Scottsdale, AZ 85252-1064  
5 (480) 990-7209 (fax is the same)  
6 [david.berry@westernresources.org](mailto:david.berry@westernresources.org)

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

9 DATED this 28<sup>th</sup> day of January, 2013

10 ARIZONA CENTER FOR LAW IN  
11 THE PUBLIC INTEREST

12 By   
13 Timothy M. Hogan  
14 202 E. McDowell Rd., Suite 153  
15 Phoenix, Arizona 85004  
16 Western Resource Advocates

17 ORIGINAL and 13 COPIES of  
18 the foregoing filed this 28<sup>th</sup> day  
19 of January, 2013, with:

20 Docketing Supervisor  
21 Docket Control  
22 Arizona Corporation Commission  
23 1200 W. Washington  
24 Phoenix, AZ 85007

25 COPIES of the foregoing  
Electronically mailed this  
28<sup>th</sup> day of January, 2013, to:

All Parties of Record

