

INTERVENTION



0000149905

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

- BOB STUMP, Chairman**
- GARY PIERCE**
- BRENDA BURNS**
- BOB BURNS**
- SUSAN BITTER SMITH**

2013 DEC 20 A 9:37

ARIZONA CORPORATION COMMISSION DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

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THE MATTER OF THE COMMISSION'S)
 INQUIRY INTO POTENTIAL IMPACTS TO) DOCKET NO. E-00000J-13-0375
 THE CURRENT UTILITY MODEL RESULTING)
 FROM INNOVATION AND TECHNOLOGICAL) **NOBLE AMERICAS ENERGY**
 DEVELOPMENTS IN GENERATION AND) **SOLUTIONS LLC APPLICATION**
 DELIVERY OF ENERGY.) **FOR LEAVE TO INTERVENE**

Pursuant to A.A.C. R14-3-105, Noble Americas Energy Solutions LLC ("Noble Solutions") hereby makes Application for Leave to Intervene ("Application") in the above-captioned and above-docketed proceeding ("Instant Proceeding"). In support of this Application, Noble Solutions submits the following information:

- 1) Noble Solutions was an active participant in the Commission's recently concluded generic docket inquiring into the subject of retail electric competition (Docket No. E-00000J-13-0375).
- 2) The Instant Proceeding is an outgrowth of the Commission's September 11, 2013 decision to administratively close the aforesaid generic docket on retail electric competition. In that regard, the Instant Proceeding was instituted by means of a November 4, 2013 letter from Commissioner Robert L. Burns to his fellow Commissioners, and a related November 4, 2013 Memorandum from Commissioner Robert L. Burns to the Commission's Docket Control requesting that a new generic docket be opened and a docket number assigned to address the subject discussed in the aforesaid November 4, 2013 letter from Commission Robert L. Burns.
- 3) Noble Solutions' business model includes the provision of some of the types of services and equipment described in Commissioner Robert L. Burns' December 5, 2013 letter to his fellow Commissioners and Interested Stakeholders, which was docketed in the Instant Proceeding on December 5, 2013. In that letter, Commissioner Robert L. Burns set forth a proposed scope for the Instant Proceeding and a proposed approach for accomplishing the goal

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1 of the Instant Proceeding.

2 4) Noble Solutions could be directly and substantially affected by a Commission
3 decision or decisions hereafter issued in the Instant Proceeding.

4 5) No other party or interested stakeholder can adequately represent the particular
5 interests of Noble Solutions within the context of the Instant Proceeding.

6 6) Noble Solutions' participation in the Instant Proceeding will not unduly broaden
7 the issues to be addressed therein.

8 7) Service of all correspondence, documents or pleadings in connection with Noble
9 Solutions' intervention in the Instant Proceeding should be made upon the following
10 representatives of Noble Solutions:

11 Lawrence V. Robertson, Jr.
12 P. O. Box 1448
13 2247 E. Frontage Road, Suite 1
14 Tubac, Arizona 85646
15 Email: Tubaclawyer@aol.com

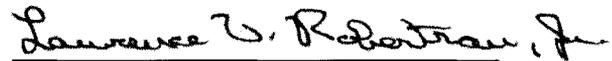
14 and

15 Greg Bass
16 Noble Americas Energy Solutions
17 401 West A Street, Suite 500
18 San Diego, California 92101
19 Email: GBass@noblesolutions.com

19 WHEREFORE, for all of the foregoing reasons, Noble Solutions hereby requests that this
20 Application be granted.

21
22 Dated this 18th day of December 2013.

23 Respectfully submitted,

24 

25 Lawrence V. Robertson, Jr.
26 Attorney for Noble Americas Energy Solutions
27 LLC

28 The original and thirteen (13) copies
of the foregoing will be mailed for filing

LAWRENCE V. ROBERTSON, JR.
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1 this 18th day of December 2013 with:

2 Docket Control Division
3 Arizona Corporation Commission
4 1200 West Washington Street
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5 A copy of the same served by e-mail
6 or first class mail that same date to:

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* Service list request only

