

INTERVENTION



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AZ. CORP COMMISSION
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4 Attorneys for Gila River Power, LP
5

6 BEFORE THE ARIZONA CORPORATION COMMISSION

7 IN THE MATTER OF THE APPLICATION
8 OF ARIZONA PUBLIC SERVICE
COMPANY, IN CONFORMANCE WITH
9 THE REQUIREMENTS OF ARIZONA
REVISED STATUTES 40-360 ET SEQ.,
10 FOR A CERTIFICATE OF
11 ENVIRONMENTAL COMPATIBILITY
AUTHORIZING THE OCOTILLO
12 MODERNIZATION PROJECT, WHICH
INCLUDES THE INSTALLATION OF FIVE
13 102 MW GAS TURBINES AND THE
14 CONSTRUCTION OF TWO 230-
KILOVOLT GENERATION
15 INTERCONNECTION FACILITIES, ALL
16 LOCATED WITHIN THE BOUNDS OF THE
EXISTING OCOTILLO POWER PLANT
17 SITUATED ON PROPERTY OWNED BY
ARIZONA PUBLIC SERVICE COMPANY
18 AND LOCATED AT 1500 EAST
19 UNIVERSITY DRIVE, TEMPE, ARIZONA,
IN MARICOPA COUNTY.
20

Docket No. L-00000D-14-0292-00169

Case No.

**APPLICATION OF GILA RIVER
POWER, LLP FOR LEAVE TO
INTERVENE**

Arizona Corporation Commission
DOCKETED

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22 Pursuant to A.R.S. § 40-360.05, Gila River Power, LLP (“GRP”), by and through
23 its attorneys undersigned, hereby files this Application for Leave to Intervene in the
24 above-captioned docket. In support of this Application, GRP states as follows:

25 1. GRP is a merchant generator selling electricity in wholesale markets located
26 in Arizona and other portions of the Southwest. GRP currently owns and operates

1 approximately 1000 MWs of natural gas generation near Gila Bend, Arizona, is a member
2 of several transmission planning organizations, and has actively participated in resource
3 planning workshops and other like forums that address issues concerning generation
4 resources in Arizona.

5 2. GRP will be directly and substantially affected by these proceedings.
6 Arizona Public Service Company's construction of new generation facilities at an
7 estimated cost of approximately \$700 million dollars will impact the wholesale market.
8 Given the amount of existing generation in the Metro Phoenix area, GRP believes that the
9 wholesale market can provide a viable alternative – at substantially lower costs – to the
10 new generation being proposed by APS in this proceeding.

11 3. Intervention by GRP will not unduly broaden the issues or delay the
12 proceeding.

13 4. If GRP is granted intervention, communications regarding these matters
14 should be served on the following:

15
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26 rturner@entegrapower.com

WHEREFORE, GRP respectfully requests that the Arizona Power Plant and Line
Siting Committee grant GRP's Application for Leave to Intervene in the above-captioned
matter.

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RESPECTFULLY SUBMITTED this 7th day of August, 2014.

FENNEMORE CRAIG, P.C.

By: 
Patrick J. Black
Attorneys for Gila River Power, L.L.P.

ORIGINAL and 13 COPIES of
the foregoing filed this 7th
day of August, 2014, with:

Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Copies of the foregoing were Hand Delivered/
Mailed/emailed this 7th day of August, 2014, to:

John Foreman, Chairman
Arizona Power Plant and Line Siting Committee
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