

# INTERVENTION



0000161217

1 FENNEMORE CRAIG, P.C.  
2 A Professional Corporation  
3 C. Webb Crockett (No. 001361)  
4 Patrick J. Black (No. 017141)  
5 2394 East Camelback Road, Suite 600  
6 Phoenix, Arizona 85016-3429  
7 Telephone (602) 916-5000  
8 Email: [wcrocket@fclaw.com](mailto:wcrocket@fclaw.com)  
9 Email: [pblack@fclaw.com](mailto:pblack@fclaw.com)

RECEIVED  
AZ CORP COMMISSION  
DOCKET CONTROL

2015 JUL 17 PM 2 31

Arizona Corporation Commission  
**DOCKETED**

JUL 17 2015

DOCKETED BY TV

Attorneys for Arizonans for Electric Choice and Competition

## BEFORE THE ARIZONA CORPORATION COMMISSION

9 IN THE MATTER OF THE APPLICATION  
10 OF UNS ELECTRIC, INC. FOR THE  
11 ESTABLISHMENT OF JUST AND  
12 REASONABLE RATES AND CHARGES  
13 DESIGNED TO REALIZE A  
14 REASONABLE RATE OF RETURN ON  
15 THE FAIR VALUE OF THE PROPERTIES  
OF UNS ELECTRIC, INC. DEVOTED TO  
ITS OPERATIONS THROUGHOUT THE  
STATE OF ARIZONA AND FOR  
RELATED APPROVALS.

DOCKET NO. E-04204A-15-0142

**APPLICATION OF ARIZONANS  
FOR ELECTRIC CHOICE AND  
COMPETITION FOR LEAVE TO  
INTERVENE**

16 Pursuant to A.A.C. R14-3-105, Arizonans for Electric Choice and Competition  
17 (“AECC”) hereby applies to the Arizona Corporation Commission (the “Commission”)  
18 for an Order granting AECC leave to intervene in the above-captioned proceeding.

19 AECC is a coalition of energy consumers which is dedicated to protecting and  
20 promoting the interests of large industrial and commercial retail electric ratepayers.  
21 AECC is concerned with and advocates for policy and rate-making decisions that treat  
22 large energy consumers fairly.

23 This Application to Intervene is also supported by AECC being a signatory to the  
24 Settlement Agreement which was approved by the Commission in Decision No. 74689 in  
25 Docket No. E-04236A-14-0011 and Docket No. E-01933A-14-0011 by which UNS  
26 Electric agreed in Condition No. 31 “ In their next rate case, TEP and UNS Electric will

1 propose a pilot program for a 'buy through' tariff available to Large Light and Power  
2 Service and Large Power Service customers, respectively.”

3 The Commission should grant AECC leave to intervene in this matter because  
4 members of AECC who are or may become customers of UNS Electric will be directly  
5 and substantially affected by the issues to be addressed in this proceeding.

6 AECC's participation will not broaden the issues nor unduly delay the proceeding,  
7 except upon leave of the Commission first had and received. For the reasons outlined  
8 above, AECC respectfully requests that the Commission grant this Application for Leave  
9 to Intervene in this matter.

10 AECC requests that all communications in connection with the above captioned  
11 proceeding be directed to:

12 C. Webb Crockett  
13 Patrick J. Black  
14 FENNEMORE CRAIG, P.C.  
15 2394 East Camelback Road, Suite 600  
16 Phoenix, Arizona 85016-3429  
17 Phone: (602) 916-5333  
18 Fax: (602) 916-5533  
19 [wcrocket@fclaw.com](mailto:wcrocket@fclaw.com)  
20 [pblack@fclaw.com](mailto:pblack@fclaw.com)

21 Kevin C. Higgins  
22 Energy Strategies, LLC  
23 215 South State Street  
24 Suite 200  
25 Salt Lake City, Utah 84111  
26 Phone: (801) 355-4365  
Fas: (801) 521-9142  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of July, 2015.

FENNEMORE CRAIG, P.C.

By: 

C. Webb Crockett  
Patrick J. Black  
Attorneys for Arizonans for Electric  
Choice and Competition

**ORIGINAL** and 13 copies filed  
this 17<sup>th</sup> day of July, 2015 with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

**COPY** of the foregoing hand-delivered/mailed  
this 17<sup>th</sup> day of July, 2015 to:

Dwight Nodes  
Acting Administrative Law Judge  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Jane Rodda  
Administrative Law Judge  
Arizona Corporation Commission  
400 W. Congress  
Tucson, Arizona 85701-1347

Janice M. Alward, Chief Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Steve Olea, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

1 **COPY** mailed/emailed  
2 this 17<sup>th</sup> day of July, 2015 to:

3 Bradley S. Carroll  
4 UNS Electric, Inc.  
5 88 E. Broadway, MS HQE910  
6 P.O. Box 711  
7 Tucson, Arizona 85702  
8 [bcarroll@tep.com](mailto:bcarroll@tep.com)

9 Michael W. Patten  
10 Roshka, DeWulf & Patten PLC  
11 One Arizona Center  
12 400 E. Van Buren, Suite 800  
13 Phoenix, Arizona 85004  
14 [mpatten@rdp-law.com](mailto:mpatten@rdp-law.com)

15 Thomas A. Loquvam  
16 Pinnacle West Capital Corporation  
17 PO Box 53999, MS 8695  
18 Phoenix, Arizona 85072-3999  
19 [Thomas.Loquvam@pinnaclewest.com](mailto:Thomas.Loquvam@pinnaclewest.com)

20 Melissa M. Krueger  
21 Pinnacle West Capital Corporation  
22 PO Box 53999, MS 8695  
23 Phoenix, Arizona 85072-3999  
24 [Melissa.Krueger@pinnaclewest.com](mailto:Melissa.Krueger@pinnaclewest.com)

25 Gregory Bernosky  
26 Arizona Public Service Company  
PO Box 53999, MS 8695  
Phoenix, Arizona 85072-3999  
[Gregory.Bernosky@aps.com](mailto:Gregory.Bernosky@aps.com)

Daniel W. Pozefsky, Chief Counsel  
RUCO  
1110 W. Washington, Suite 220  
Phoenix, Arizona 85007  
[dpozefsky@azruco.gov](mailto:dpozefsky@azruco.gov)

Robert J. Metli  
Munger Chadwick, PLC  
2398 E. Camelback Road, Suite 240  
Phoenix, Arizona 85016  
[rjmetli@mungerchadwick.com](mailto:rjmetli@mungerchadwick.com)

Nucor Steel Kingman LLC  
c/o Doug Adams  
3000 W. Old Highway 66  
Kingman, Arizona 86413

Lawrence V. Robertson, Jr.  
PO Box 1448  
Tubac, Arizona 85646  
[tubaclawyer@aol.com](mailto:tubaclawyer@aol.com)

Eric J. Lacey  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St. NW  
8<sup>th</sup> Floor, West Tower  
Washington, DC 20007

Court S. Rich  
Rose Law Group PC  
7144 E. Stetson Dr., Suite 300  
Scottsdale, Arizona 85251  
[crich@roselawgroup.com](mailto:crich@roselawgroup.com)

Scott S. Wakefield  
Ridenour Hienton, PLLC  
201 North Central Avenue  
Suite 3300  
Phoenix, Arizona 85004  
[swakefield@rhlfirm.com](mailto:swakefield@rhlfirm.com)

Steve W. Chriss  
Senior Manager, Energy Regulatory  
Analysis  
Wal-Mart Stores, Inc.  
2011 S.E. 10<sup>th</sup> Street  
Bentonville, AR 72716-0550  
[stephen.chriss@wal-mart.com](mailto:stephen.chriss@wal-mart.com)

Timothy M. Hogan  
Arizona Center for Law in the  
Public Interest  
202 E. McDowell Road, Suite 153  
Phoenix, Arizona 85004  
[thogan@aclpi.org](mailto:thogan@aclpi.org)

1 Jeff Schlegel  
2 SWEEP Arizona Representative  
3 1167 W. Samalayuca Dr.  
4 Tucson, Arizona 85704  
5 [schlegelj@aol.com](mailto:schlegelj@aol.com)

6 Ellen Zuckerman  
7 SWEEP Senior Associate  
8 4231 E. Catalnia Dr.  
9 Phoenix, Arizona 85018  
10 [ezuckerman@swenergy.org](mailto:ezuckerman@swenergy.org)

11 Meghan H. Grabel  
12 Osborn Maledon, P.A.  
13 2929 North Central Avenue  
14 Phoenix, Arizona 85012  
15 [mgrabel@hotmail.com](mailto:mgrabel@hotmail.com)

16 Gary Yaquinto  
17 Arizona Investment Council  
18 2100 North Central Avenue  
19 Phoenix, Arizona 85004  
20 [gyaquinto@arizonaic.org](mailto:gyaquinto@arizonaic.org)

21  
22  
23  
24  
25  
26  
By:   
10634150.1