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AZ CORP COMM
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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS:

9 **SUSAN BITTER SMITH, Chairperson**
 10 **BOB STUMP**
 11 **BOB BURNS**
 12 **DOUG LITTLE**
TOM FORESE

13 IN THE MATTER OF THE APPLICATION) **DOCKET NO. E-04204A-15-0142**
 14 OF UNS ELECTRIC, INC. FOR THE)
 ESTABLISHMENT OF JUST AND)
 15 REASONABLE RATES AND CHARGES) **APPLICATION OF FRESH PRODUCE**
 DESIGNED TO REALIZE A) **ASSOCIATION OF AMERICAS, FOR LEAVE**
 16 REASONABLE RATE OF RETURN ON) **TO INTERVENE**
 THE FAIR VALUE OF THE)
 17 PROPERTIES OF UNS ELECTRIC, INC.)
 DEVOTED TO ITS OPERATIONS)
 18 THROUGHOUT THE STATE OF)
 ARIZONA, AND FOR RELATED)
 19 APPROVALS.)
 20 _____)

Arizona Corporation Commission

DOCKETED

OCT 14 2015

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I. INTRODUCTION

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 23 Through counsel undersigned and pursuant to A.A.C. R14-3-105 the Fresh
 24 Produce Association of the Americas ("FPAA") an Arizona non-profit corporation,
 25 submits its Application for and order for Leave to Intervene ("Application") in the above-
 26 captioned and above-docketed proceeding ("Instant Proceeding"). In support of its
 Application, FPAA submits the following information.

1 **II. IDENTITY OF APPLICANT**

2 Founded in Nogales, Arizona, in 1944, FPAA is a member trade organization
3 with more than 100 members. FPAA is a 501 (C)(6) organization under the U.S.
4 Internal Revenue Code. Members of FPAA are involved in the production, harvest,
5 marketing, importation, and distribution of fresh Mexican produce in the United States
6 and throughout the world. FPAA provides a venue for its members to share information
7 with others involved in the fresh produce industry. FPAA also serves as an advocate
8 for its members and keeps them apprised of changes in regulatory, governmental and
9 industry matters that affect the member's business.
10

11 **III. APPLICANT AND ITS MEMBERS COULD BE SUBSTANTIALLY AND**
12 **DIRECTLY AFFECTED BY A COMMISSION DECISION IN THE INSTANT**
13 **PROCEEDING:**

14 FPAA members are located in the UNS Electric service area in Santa Cruz
15 County and receive their electric power from UNS Electric. FPAA Members typically
16 maintain large cold storage facilities located primarily in Nogales and Santa Cruz
17 County, Arizona designed to preserve the freshness of these perishable agricultural
18 commodities. Because of the large facilities they maintain FPAA members and the
19 industry they represent are substantial consumers of electric power. However, because
20 FPAA Members and the industry they represent utilize the majority of their power in the
21 winter months, a time of low consumption by other users, FPAA Members and the
22 industry they represent believe they are not typical of standard usage models upon
23 which UNS Electric bases its rates and charges. FPAA and its members will be directly
24 affected by any change in UNS Electric's rates and charges for electric service because
25 any such changes will affect each member's cost of doing business. FPAA seeks to
26

1 advocate for its members and to keep them informed in this proceeding.

2 **IV. APPLICANT'S INTERVENTION WILL NOT DELAY THE INSTANT**
3 **PROCEEDING OR UNDULY BROADEN THE ISSUES:**

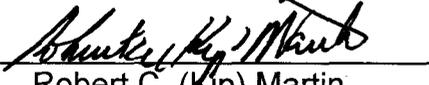
4 The FPAA's intervention will not delay or unduly broaden the issues in the matter
5 referenced above. FPAA's concerns are directly related to the rates and charges
6 proposed by UNS Electric in this matter. FPAA does not at this time anticipate the need
7 to raise any new matters.

8 **V. CONCLUSION**

9
10 Based upon the foregoing, FPAA believes that it has satisfied the requirements
11 for intervention set forth in A.A.C. R14-3-105. Accordingly, it requests that an
12 appropriate order of the Commission be issued granting FPAA's Application, and
13 according FPAA all rights as a party of record in the instant proceeding.

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16 Respectfully submitted, this 13th day of October, 2015,

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18 COOGAN & MARTIN, P.C.
19 Attorneys for the Fresh Produce
20 Association of the Americas, an Arizona
21 non-profit corporation,

22 By: 

23 Robert C. (Kip) Martin
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1 The original and thirteen (13) copies of the
2 Foregoing Application will be sent
3 Via Federal Express for filing
4 October 13, 2015 to:

5 Docket Control
6 Arizona Corporation Commission
7 1200 W. Washington Street
8 Phoenix, Arizona 85007

9 A copy of this Application for Leave to Intervene
10 has been emailed or will be mailed
11 this same date to parties of record in the case
12 as follows:

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