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BEFORE THE ARIZONA CORPORATION COMMISSION

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7
8 IN THE MATTER OF THE APPLICATION OF
9 UNS ELECTRIC, INC. FOR THE
10 ESTABLISHMENT OF JUST AND
11 REASONABLE RATES AND CHARGES
12 DESIGNED TO REALIZE A REASONABLE
13 RATE OF RETURN ON THE FAIR VALUE
14 OF THE PROPERTIES OF UNS ELECTRIC,
15 INC. DEVOTED TO ITS OPERATIONS
16 THROUGHOUT THE STATE OF ARIZONA
17 AND FOR RELATED APPROVALS.

Docket No. E-04204A-15-0142

Arizona Corporation Commission
DOCKETED

OCT 15 2015

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14 RUCO'S RESPONSE TO ARIZONA UTILITY RATEPAYER ALLIANCE'S

15 MOTION TO INTERVENE

16 The Residential Utility Consumer Office ("RUCO") hereby responds to Arizona Utility
17 Ratepayer Alliance's ("AURA") Motion to Intervene as follows. AURA is a private group which
18 claims to be an advocate for the ratepayer. UNS Electric ("UNS") opposes AURA's
19 intervention because AURA is not a customer of UNS. UNS further objects apparently because
20 AURA is a private lobbying group for ratepayers and as such should not be allowed to
21 intervene.

22 RUCO is concerned with the precedent that the Commission would set by approving
23 UNS' position. Oftentimes, private ratepayer groups intervene on behalf of its constituent's
24 interests. Homeowner's associations are frequent intervenors who without question are

1 allowed to intervene in ratepayer matters. Likewise, private groups who represent utility
2 interests such as the Arizona Investment Council are allowed to intervene without question.
3 AURA admits to being funded by the pro-solar Energy Foundation as “an advocate for clean
4 energy technology.” Whether that makes AURA a legitimate ratepayer advocate or a solar
5 advocate might still be unclear. Either way, as the official residential utility consumer advocate
6 for the state of Arizona, RUCO sees no reason to distinguish AURA from other types of private
7 groups which represent special interests.

8 Finally, UNS’ argument that AURA’s application should be denied since AURA is not a
9 customer of UNS should also be rejected. The answer here is obvious – there is no legal
10 requirement that an intervenor is a customer – it must have a direct and substantial interest.

11 A.A.C. R14-3-105(A).

12 For the above reasons, RUCO sees no reason to oppose AURA’s application to
13 intervene.

14 RESPECTFULLY SUBMITTED this 15th day of October, 2015.

15
16 /s/ Daniel W. Pozefsky

17 _____
18 Daniel W. Pozefsky
19 Chief Counsel

20 AN ORIGINAL AND THIRTEEN COPIES
21 of the foregoing filed this 15th day
22 of October, 2015 with:

23 Docket Control
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mailed this 15th day of October, 2015 to:

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