

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

Arizona Corporation Commission

SUSAN BITTER SMITH, Chairman
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SEP 02 2015

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AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF NET METERING COST SHIFT
SOLUTION

DOCKET NO. E-01345A-13-0248

MOTION TO INTERVENE

1 The Arizona Utility Ratepayer Alliance, ("AURA"), hereby moves to intervene in the
2 above-captioned docket.

3 **I. Service**

4 Please serve all documents on:

Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd.
Suite. 200-676
Phoenix, Arizona 85028
Craig.Marks@azbar.org

and

Pat Quinn
President and Managing Partner
Arizona Utility Ratepayer Alliance
5521 E. Cholla St.
Scottsdale, AZ 85254
Pat.Quinn47474@gmail.com

ORIGINAL

5 **II. Description of Intervenor**

6 The Arizona Utility Ratepayer Alliance was founded in 2015 to advise and represent
7 utility ratepayers on vital issues affecting their pocketbook. AURA is a nonpolitical, non-partisan
8 organization advocating on behalf of everyday Arizonans to ensure that utilities act responsibly
9 with affordable rates, subject to transparent regulation, while providing sustainable utility
10 services. Independent from the Governor's Office, Legislature, or any other government entity,
11 AURA is unique in its commitment to all Arizona ratepayers, advocating effective and efficient
12 utility oversight. AURA does not advocate any particular alternative energy production or
13 efficiency measures; rather it believes that all such prudent measures should be part of Arizona's
14 energy portfolio, with rates set accordingly but without undue ratepayer subsidies.

1 **III. Interest in Proceeding**

2 In Decision No. 75251 in the above-captioned docket, the Commission determined that
3 Arizona Public Service Company's application for a reset of its Lost Fixed Cost Recovery
4 ("LFCR") adjustor mechanism should be set for an evidentiary proceeding. Further,

5 Prior to any procedural conference, at a future Commission Staff Open Meeting, the
6 Commission will consider the scope of the proceeding and identify issues it would like to
7 be addressed, and will direct the Hearing Division to include those issues for discussion
8 at the procedural conference.¹

9 Also, on August 20, 2015, the Commission's Legal Division stated:

10 The Commission indicated it would consider the scope of the proceeding and identify
11 issues that it would like to be addressed at a forthcoming Commission Staff Open
12 meeting. To be timely, comments on the possible scope and issues for the proceeding
13 should be filed by September 4, 2015.²

14 AURA intends to fully participate in the to-be-scheduled proceedings, including filing
15 comments by the September 4 deadline.

16 AURA's motion is timely because the scope of the upcoming proceeding has not been
17 determined and no hearings have been scheduled. Accordingly, no party would be prejudiced by
18 granting AURA's motion.

19 AURA reserves the right to take positions on any other issues in this case.

20 No other party can adequately represent AURA's interests.

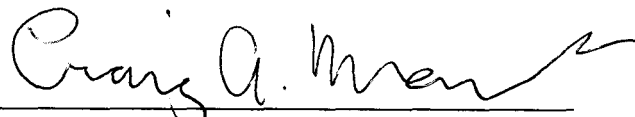
21 **IV. Requested Relief**

22 AURA asks that the Commission grant its Motion to Intervene.

¹ Decision No. 75231, dated August 31, 2015, at 32:8-11.

² Notice of Opportunity to Provide Comments Concerning Scope of the Proceeding, dated August 20, 2015.

1 Respectfully submitted on September 2, 2015, by:
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6 Craig A. Marks
7 Craig A. Marks, PLC
8 10645 N. Tatum Blvd.
9 Suite 200-676
10 Phoenix, AZ 85028
11 (480) 367-1956
12 Craig.Marks@azbar.org
13 Attorney for Arizona Utility Ratepayer Alliance

14 **Original** and 13 copies **filed**
15 on September 2, 2015, with:

16
17 Docket Control
18 Arizona Corporation Commission
19 1200 West Washington
20 Phoenix, Arizona 85007
21

22 **Copies e-mailed**
23 on September 2, 2015 to:

24
25 **Service List**