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BEFORE THE ARIZONA CORPORATION COMMISSION

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- 6 TOM FORESE
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- 7

8 IN THE MATTER OF THE APPLICATION OF
 9 TUCSON ELECTRIC POWER COMPANY
 10 FOR APPROVAL OF ITS 2016 RENEWABLE
 11 ENERGY STANDARD IMPLEMENTATION
 12 PLAN.

Docket No. E-01933A-15-0239

RUCO'S APPLICATION TO INTERVENE

I.

14 The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the
 15 Arizona Corporation Commission ("Commission") for an Order granting it leave to
 16 intervene in the above-captioned proceeding.

II.

18 RUCO was established by the enactment of Arizona Revised Statutes, Section 40-
 19 461, *et seq.*, for the purpose of representing residential utility consumers in matters before
 20 the Commission concerning regulated public service corporations.

Arizona Corporation Commission
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1 III.

2 Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the
3 Director of RUCO may do the following:

4 Prepare and present briefs, arguments, proposed rates or
5 orders and intervene or appear on behalf of residential utility
6 consumers before hearing officers and the Corporation
7 Commission as a party in interest and also participate as a
8 party in interest pursuant to Section 40-254 in proceedings
9 relating to rate making or rate design and involving public
10 service corporations.

11 IV.

12 The residential utility consumers will be directly and substantially affected by a
13 Decision or Order of the Commission in this matter, therefore, it is necessary and proper
14 that RUCO intervene in the proceeding.

15 V.

16 In order to fulfill its statutory obligation to protect the residential utility consumers of
17 this State, RUCO must thoroughly examine the materials presented by the Company, and
18 must cross-examine witnesses appearing on behalf of the Company and any other parties.
19 Additionally, RUCO may present testimony and exhibits of its own in any hearings
20 conducted by the Commission in this matter.

21 VI.

22 The name, mailing address, and telephone number of the person upon whom
23 service of all documents is to be made is:
24

1 Daniel W. Pozefsky
2 Chief Counsel
3 Residential Utility Consumer Office
4 1110 West Washington, Suite 220
5 Phoenix, Arizona 85007
6 (602) 364-4839

7
8 RESPECTFULLY SUBMITTED this 5th day of October, 2015.

9
10 
11 Daniel W. Pozefsky
12 Chief Counsel

13 AN ORIGINAL AND THIRTEEN COPIES
14 of the foregoing filed this 5th day
15 of October, 2015 with:

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

20 COPIES of the foregoing hand delivered/
21 mailed this 5th day of October, 2015 to:

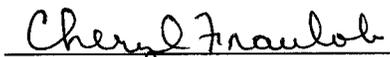
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By 
Cheryl Fraulob