

ORIGINAL

INTERVENTION



0000166923

1 Timothy M. Hogan (004567)  
2 ARIZONA CENTER FOR LAW  
3 IN THE PUBLIC INTEREST  
4 202 E. McDowell Rd., Suite 153  
5 Phoenix, Arizona 85004  
6 (602) 258-8850

7 *Attorneys for Western Resource Advocates*

RECEIVED

2015 NOV 19 P 3:45

AZ CORP COMMISSION  
DOCKET CONTROL

8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

Arizona Corporation Commission

9 SUSAN BITTER SMITH, Chairman  
10 BOB STUMP  
11 BOB BURNS  
12 DOUG LITTLE  
13 TOM FORESE

**DOCKETED**

NOV 19 2015

DOCKETED BY

14 IN THE MATTER OF THE COMMISSION'S  
15 INVESTIGATION OF VALUE AND COST  
16 OF DISTRIBUTED GENERATION.

Docket No. E-00000J-14-0023

**PETITION FOR LEAVE TO  
INTERVENE OF WESTERN  
RESOURCE ADVOCATES**

17 Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission  
18 (“Commission”), Western Resource Advocates (“WRA”) hereby moves to intervene in the  
19 above-captioned docket and, in support thereof, states as follows:

20 1. WRA is a non-profit regional environmental law and policy organization serving  
21 six western states including Arizona. WRA has been involved in numerous proceedings before  
22 the Commission and has been granted intervenor status in numerous dockets.

23 2. WRA’s Clean Power Program promotes policies and programs designed to  
24 encourage the development of clean energy technologies, energy efficiency, renewable  
25 resources, distributed generation, and other measures that help reduce the environmental impacts  
of meeting the demand for energy services, while minimizing costs and risks to ratepayers.

1 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.

2 4. WRA requests that all pleadings, correspondence, discovery and other documents  
3 be served on the following:

4 Timothy M. Hogan  
5 Arizona Center for Law in the Public Interest  
6 202 E. McDowell Road, Suite 153  
7 Phoenix, Arizona 85004  
8 (602) 258-8850  
9 FAX: (602) 258-8757  
10 [thogan@aclpi.org](mailto:thogan@aclpi.org)

11 Ken Wilson  
12 Western Resource Advocates  
13 2260 Baseline Road, Suite 200  
14 Boulder, CO 80302  
15 (720) 763-3739  
16 [ken.wilson@westernresources.org](mailto:ken.wilson@westernresources.org)

17 WHEREFORE, WRA respectfully requests that the Commission issue an order granting  
18 its Motion to Intervene in the above-captioned proceeding.

19 DATED this 19<sup>th</sup> day of November, 2015.

20 ARIZONA CENTER FOR LAW IN  
21 THE PUBLIC INTEREST

22 By 

23 Timothy M. Hogan  
24 202 E. McDowell Rd., Suite 153  
25 Phoenix, Arizona 85004  
*Attorneys for Western Resource Advocates*

///

///

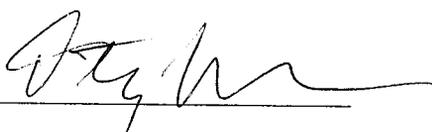
///

1 ORIGINAL and 13 COPIES of  
2 the foregoing filed this 19<sup>th</sup> day  
of November, 2015, with:

3 Docketing Supervisor  
4 Docket Control  
5 Arizona Corporation Commission  
6 1200 W. Washington  
7 Phoenix, AZ 85007

8 COPIES of the foregoing  
9 Electronically mailed this  
10 19<sup>th</sup> day of November, 2015, to:

11 All Parties of Record

12   
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25