

INTERVENTION



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ORIGINAL

BEFORE THE ARIZONA CORPORATIO

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3 COMMISSIONERS

2015 DEC 18 P 12: 24

- 4 SUSAN BITTER SMITH, Chairman
- 5 BOB STUMP
- 6 BOB BURNS
- 7 DOUG LITTLE
- 8 TOM FORESE

AZ CORP COMMISSION
DOCKET CONTROL

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

DOCKET NO. E-01933A-15-0322

ARIZONA INVESTMENT
COUNCIL'S MOTION FOR
LEAVE TO INTERVENE

DOCKETED

DEC 18 2015

DOCKETED BY

OSBORN
MALEDON

A PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW

20 Pursuant to A.A.C. R14-3-105, the Arizona Investment Council ("AIC") applies
 21 to the Commission for an Order granting it leave to intervene in this proceeding. In
 22 support of its Motion, AIC states as follows:

23 1. AIC's missions include the promotion of policies that encourage utility
 24 investment and infrastructure development in Arizona, as well as to represent the
 25 interests of debt and equity investors in Arizona utilities. AIC's nearly 6,000 members
 26 include Arizona utility service providers and individuals who hold stock or debt
 27 instruments in these utilities.

28 2. AIC and its members have a substantial interest in this proceeding. The
 rates and level of earnings the Commission authorizes for Tucson Electric Power
 Company impact present, as well as prospective, debt and equity investors. The
 Commission's decision in this case also sends important signals to capital markets
 concerning Arizona's regulatory attitude regarding utility investment, required
 infrastructure development and improvement, and the evolution of utility rate design.

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3. No other party can adequately represent the interests of AIC's members in this docket. Its participation will not unduly broaden the issues presented.

4. Service of all correspondence, pleadings, and other documents should be made to the following:

Meghan H. Grabel
Osborn Maledon, P.A.
2929 N. Central Avenue, Suite 2100
Phoenix, Arizona 85012
Email: mgrabel@omlaw.com

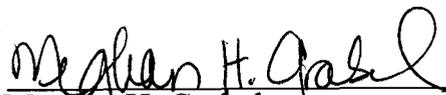
with a copy to:

Gary Yaquinto, President & CEO
Arizona Investment Council
2100 N. Central Avenue, Suite 210
Phoenix, Arizona 85004
Email: gyaquinto@arizonaic.org

WHEREFORE, AIC requests that the Administrative Law Judge issue an order granting its Motion to Intervene.

RESPECTFULLY SUBMITTED this 18th day of December, 2015.

OSBORN MALEDON, P.A.

By: 
Meghan H. Grabel
2929 N. Central Avenue, Suite 2100
Phoenix, AZ 85012

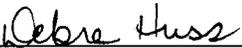
Attorneys for Arizona Investment Council

1 **Original and 13 copies** filed this
2 18th day of December, 2015, with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, AZ 85007

7 **Copies of the foregoing** mailed
8 this 18th day of December, 2015, to:

9 All Parties of Record

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