

# INTERVENTION

BEFORE THE ARIZONA CORPORATION COMI



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1  
2 DOUG LITTLE  
   ACTING CHAIRMAN  
3 BOB STUMP  
   COMMISSIONER  
4 BOB BURNS  
   COMMISSIONER  
5 TOM FORESE  
   COMMISSIONER  
6 VACANT  
   COMMISSIONER  
7

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AZ CORP COMMISSION  
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8 IN THE MATTER OF THE APPLICATION OF  
9 EPCOR WATER ARIZONA INC., FOR  
10 APPROVAL OF AN ACCOUNTING ORDER  
11 TO DEFER POST-IN-SERVICE  
12 ALLOWANCE FOR FUNDS USED DURING  
13 CONSTRUCTION AND AMORTIZATION  
14 EXPENSE.

Docket No. WS-01303A-15-0424

## RUCO'S APPLICATION TO INTERVENE

I.

15 The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the  
16 Arizona Corporation Commission ("Commission") for an Order granting it leave to  
17 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..  
21

22 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 Daniel W. Pozefsky  
Chief Counsel  
Residential Utility Consumer Office  
1110 West Washington St., Suite 220  
Phoenix, Arizona 85007  
(602) 364-4839

1 RESPECTFULLY SUBMITTED this 25<sup>th</sup> day of January, 2016.

2  
3   
4 Daniel W. Pozefsky  
5 Chief Counsel

6 AN ORIGINAL AND THIRTEEN COPIES  
7 of the foregoing filed this 25<sup>th</sup> day  
8 of January, 2016 with:

9 Docket Control  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, Arizona 85007

13 COPIES of the foregoing hand delivered/  
14 mailed this 25<sup>th</sup> day of January, 2016 to:

15 Dwight Nodes  
16 Hearing Division  
17 Arizona Corporation Commission  
18 1200 W. Washington  
19 Phoenix, Arizona 85007

20 Janice Alward  
21 Legal Division  
22 Arizona Corporation Commission  
23 1200 West Washington  
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By 