

ORIGINAL

INTERVENTION



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AZ CORP COMMISSION
DOCKET CONTROL

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

9 DOUG LITTLE, Chairman
10 BOB STUMP
11 BOB BURNS
12 TOM FORESE
13 ANDY TOBIN

14 IN THE MATTER OF THE APPLICATION
15 OF TUCSON ELECTRIC POWER
16 COMPANY FOR THE ESTABLISHMENT
17 OF JUST AND REASONABLE RATES
18 AND CHARGES DESIGNED TO REALIZE
19 A REASONABLE RATE OF RETURN ON
20 THE FAIR VALUE OF THE PROPERTIES
21 OF TUCSON ELECTRIC POWER
22 COMPANY DEVOTED TO ITS
23 OPERATIONS THROUGHOUT THE
24 STATE OF ARIZONA AND FOR RELATED
25 APPROVALS.

Docket No. E-01933A-15-0322

**MOTION FOR LEAVE TO
INTERVENE OF WESTERN
RESOUCE ADVOCATES**

Arizona Corporation Commission
DOCKETED

MAR 29 2016

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km FE

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

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

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

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

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

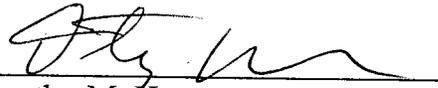
11 Timothy M. Hogan
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18 Ken Wilson
19 Western Resource Advocates
20 2260 Baseline Road, Suite 200
21 Boulder, CO 80302
22 (720) 763-3739
23 ken.wilson@westernresources.org

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

1 DATED this 29th day of March, 2016.

2
3 ARIZONA CENTER FOR LAW IN
4 THE PUBLIC INTEREST

5 By 
6 Timothy M. Hogan
7 514 W. Roosevelt Street
8 Phoenix, Arizona 85003
9 *Attorneys for Western Resource Advocates*

10 ORIGINAL and 13 COPIES of
11 the foregoing filed this 29th day
12 of March, 2016, with:

13 Docketing Supervisor
14 Docket Control
15 Arizona Corporation Commission
16 1200 W. Washington
17 Phoenix, AZ 85007

18 COPIES of the foregoing
19 Electronically mailed this
20 29th day of March, 2016, to:

21 All Parties of Record

22
23
24
25
