

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 GARY PIERCE
CHAIRMAN

3 BOB STUMP
COMMISSIONER

4 SANDRA D. KENNEDY
COMMISSIONER

5 PAUL NEWMAN
COMMISSIONER

6 BRENDA BURNS
COMMISSIONER

7
8 IN THE MATTER OF THE APPLICATION OF
9 TUCSON ELECTRIC POWER COMPANY
10 FOR THE ESTABLISHMENT OF JUST AND
11 REASONABLE RATES AND CHARGES
DESIGNED TO REALIZE A REASONABLE
RATE OF RETURN ON THE FAIR VALUE
OF ITS OPERATIONS THROUGHOUT THE
STATE OF ARIZONA.

Docket No. E-01933A-12-0291

12 **RUCO'S APPLICATION TO INTERVENE**

13 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.

17 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 III.

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

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

5 IV.

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

9 V.

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

15 VI.

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

18 Daniel Pozefsky
19 Chief Counsel
Residential Utility Consumer Office
20 1110 West Washington, Suite 220
Phoenix, Arizona 85007
21 (602) 364-4839

22 RESPECTFULLY SUBMITTED this 3rd day of August, 2012.

23 _____
24 Daniel Pozefsky
Chief Counsel

1 AN ORIGINAL AND THIRTEEN COPIES
of the foregoing filed this 3rd day
2 of August, 2012 with:

3 Docket Control
Arizona Corporation Commission
4 1200 West Washington
Phoenix, Arizona 85007

5 COPIES of the foregoing hand delivered/
6 mailed this 3rd day of August, 2012 to:

7 Lyn Farmer
Chief Administrative Law Judge
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10 Janice Alward, Chief Counsel
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13 Steven Olea, Director
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23
24 By _____
Cheryl Fraulob