

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 APPROVAL OF ITS 2011-2012
11 ENERGY EFFICIENCY IMPLEMENTATION
12 PLAN

Docket No. E-01933A-11-0055

11 **RUCO'S APPLICATION TO INTERVENE**

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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.

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18 II.

19 RUCO was established by the enactment of Arizona Revised Statutes, Section 40-
20 461, *et seq.*, for the purpose of representing residential utility consumers in matters before
21 the Commission concerning regulated public service corporations.
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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

1 Daniel W. Pozefsky
2 Chief Counsel
3 Residential Utility Consumer Office
4 1110 West Washington, Suite 220
5 Phoenix, Arizona 85007
6 (602) 364-4839

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8 RESPECTFULLY SUBMITTED this 16th day of March, 2012.

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Daniel W. Pozefsky
Chief Counsel

11 AN ORIGINAL AND THIRTEEN COPIES
12 of the foregoing filed this 16th day
13 of March, 2012 with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 West Washington
16 Phoenix, Arizona 85007

16 COPIES of the foregoing hand delivered/
17 mailed this 16th day of March, 2012 to:

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21 Janice Alward, Chief Counsel
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8 By _____
Cheryl Fraulob

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