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PINNACLE WEST  
CAPITAL CORPORATION

LAW DEPARTMENT

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Thomas L. Mumaw  
Senior Attorney  
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Direct Line

September 19, 2005

Commissioner William A. Mundell  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007-2996

Re: APS Bill Estimation;  
Docket No. E-01345A-03-0437 and E-01345A-05-0526

Dear Commissioner Mundell:

This letter will confirm that it is standard Arizona Public Service Company ("APS") practice to provide customers at least as many months to pay an underbilling as the months covered by the underbilling. For purposes of such policy, APS would treat a month in which no bill was issued to the customer as an underbilling month.

I hope this is responsive to your request. Please let me know if you have any other questions concerning APS billing practices.

Sincerely,

Thomas L. Mumaw

Attorney for Arizona Public Service Company

TLM/  
Enclosures

cc: Chairman Jeff Hatch-Miller  
Commissioner Mike Gleason  
Commissioner Marc Spitzer  
Commissioner Kristin K. Mayes  
Parties to the Docket

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