



BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER

DOCKETED

MAY 13 2002

DOCKETED BY

2002 MAY 13 P 2:42  
AZ CORP COMMISSION  
DOCUMENT CONTROL

E-00000A-02-0051  
E-01345A-01-0822  
E-00000A-01-0630  
E-01933A-02-0069  
E-01933A-98-0471

IN THE MATTER OF THE GENERIC  
PROCEEDINGS CONCERNING ELECTRIC  
RESTRUCTURING ISSUES.

Docket No.

TUCSON ELECTRIC POWER  
COMPANY'S TRACK B PROPOSALS

Tucson Electric Power Company ("TEP"), through undersigned counsel, in response to the Procedural Orders dated May 2, 2002 (the "Procedural Orders"), hereby submits its proposed (a) list of qualifications to act as an independent consultant/evaluator; (b) list of issues for consideration in the Track B proceeding; and (c) procedural timetable for meeting the October 21, 2002 completion date, as follows:

**I. INTRODUCTION.**

The Procedural Orders establish two separate, but concurrent, proceedings to address issues that have been raised in connection with the Arizona Public Service Company ("APS") and TEP requests for a variance to the Electric Competition Rules.<sup>1</sup> The first proceeding, "Track A", involves "the transfer of assets and associated market power issues, as well as the issues of the Code of Conduct, the Affiliated Interest Rules, and the jurisdictional issues raised by Chairman Mundell." Procedural Order I at 1-2.

<sup>1</sup> On May 2, 2002, the Commission issued two Procedural Orders in this matter. The eleven- page Procedural Order addressing the schedules for Track A and Track B shall be referred to as "Procedural Order I". The two- page Procedural Order addressing the TEP MGC issues shall be referred to as "Procedural Order II".

1 The second proceeding, "Track "B", is to address issues surrounding the anticipated  
2 competitive solicitation of electric power and the TEP Motion for Clarification of  
3 Settlement Agreement. Procedural Order I at 2; and Procedural Order II at 2.

4 The Commission has instructed interested parties to submit, on or before March 13,  
5 2002, a proposed (a) list of qualified persons to act as an independent consultant/evaluator;  
6 (b) list of issues for consideration in the Track B proceeding; and (c) procedural timetable  
7 for meeting the October 21, 2002 completion date. The Commission has also set a  
8 deadline of May 29, 2002, for filing direct testimony relevant to Track A issues.  
9

10  
11 A. Track B proposals should be considered in context with Track A testimony.

12  
13 TEP believes that it is important that the Commission evaluate the Track B  
14 proposals contained herein in the context of the Track A direct testimony. TEP's Track A  
15 testimony (and the Commission's response thereto) may impact the current concept of  
16 competitive solicitation in the wholesale electric power market. Accordingly, TEP  
17 reserves the right to modify or supplement any of the proposals set forth herein.  
18

19  
20 B. TEP requests that the Commission grant TEP's Request for Variance.

21 TEP also remains concerned that the Commission will not complete the Track A  
22 and Track B proceedings in time for TEP to meet the December 31, 2002 deadline to  
23 divest its generating assets and begin competitive solicitation of its power needs. In light  
24 of the schedules announced in the Procedural Orders, under the best-case scenario, the  
25 Commission will not rule on the generic Track B issues until October 21, 2002. The  
26  
27

1 Commission will then need to apply those standards and processes specifically to TEP and  
2 its service territory. Assuming that there is no slippage in the generic Track B timetable,  
3 TEP will only have a little more than two (2) months to participate in TEP-specific Track  
4 B hearings and then implement the standards and processes ordered by the Commission.  
5

6 Thus, TEP renews its request that the Commission provide TEP and the other  
7 parties with clear direction by granting a variance until after the re-evaluation and, if  
8 necessary, modification of the Electric Competition Rules has been completed. Additional  
9 testimony in support of this request will be provided in TEP's Track A direct testimony.<sup>2</sup>  
10

11 **II. LIST OF QUALIFICATIONS TO ACT AS AN INDEPENDENT**  
12 **CONSULTANT/EVALUATOR.**

13 TEP understands that the Commission is contemplating hiring an independent  
14 consultant/evaluator ("independent consultant") to assist in the development of a  
15 competitive solicitation process. TEP appreciates the opportunity to provide the  
16 Commission with input into the selection of the independent consultant.  
17

18  
19 TEP's first impression is that an independent consultant is not indispensable to the  
20 development of a competitive solicitation process. TEP believes that there is sufficient  
21 expertise among the utilities, merchants, Commission Staff and other intervenors in this  
22 proceeding to establish guidelines for the competitive solicitation of electric power.  
23  
24 Inasmuch as there has been, up to this point in time, few competitive solicitation processes  
25

26 <sup>2</sup> TEP's Request for Variance seeks the extension of the compliance dates for A.A.C. R14-  
27 2-1606.B and R-14-2-1615A until either December 31, 2003 or a date six (6) months after a final  
order in the docket, whichever is later.

1 that have been implemented (and with limited experience with which to judge their long  
2 term success) TEP is not entirely convinced that an independent consultant would have  
3 incrementally more experience in developing appropriate policies and procedures than the  
4 participants in this docket.  
5

6 Nevertheless, if the Commission is determined to hire an independent consultant to  
7 assist it, then TEP believes that the following criteria should be followed to ensure that the  
8 consultant selected is experienced and independent:  
9

- 10 1. The independent consultant does not have a financial interest in and is not  
11 representing any utility, ESP or merchant power provider certificated in  
12 Arizona (or whose application for a certificate is pending) or who owns or is  
13 constructing a power plant in the State.  
14
- 15 2. The independent consultant has prior experience in developing policies and  
16 procedures for competitive solicitation in the electric power industry.  
17
- 18 3. The independent consultant has prior experience with wholesale power  
19 markets in the Southwest Region of California, Nevada, Arizona and New  
20 Mexico.  
21
- 22 4. The independent consultant is not representing any Regional Transmission  
23 Organization, Independent Systems Organization or the Federal Energy  
24 Regulatory Commission.  
25  
26  
27

1 TEP has not contacted any potential independent consultants to determine if they  
2 are interested in fulfilling the role or if they meet the criteria.<sup>3</sup> TEP will provide any  
3 names it may have of potential independent consultants directly to Commission Staff.  
4

5 **III. LIST OF ISSUES.**

6  
7 One of the lessons learned from the prior Electric Competition Rules proceedings is  
8 that it is virtually impossible, at the onset, to anticipate all of the issues that will arise and  
9 need to be addressed. Consequently, TEP does not claim that its list of issues contains all  
10 of the issues that should be addressed or may present themselves in the future. However,  
11 TEP has identified some fundamental, although generic, issues that the Commission will  
12 need to resolve as it seeks to develop a process for competitive solicitation of electric  
13 power in the State.  
14

15  
16 In submitting this list, TEP has only sought to identify generic issues, rather than  
17 explain its position on those issues. Accordingly, TEP reserves the right to modify and  
18 supplement this list of issues and to state its position in subsequent pleadings.  
19

20 Again, TEP believes that it is important that the proposed Track B issues be  
21 analyzed in connection with the Track A issues. In fact, the solution to many of the Track  
22 B issues is dependent upon the Commission's resolution of the Track A issues. As one  
23

24  
25  
26 <sup>3</sup> TEP did not contact any specific individuals so as to avoid the possibility that its  
27 communication would be viewed as an attempt to influence the potential consultants' view and  
thereby jeopardize its independence.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

example, how the Commission resolves the issues surrounding the divestiture of generation assets will have an impact on many aspects of competitive solicitation.

Listed below are four (4) general Track B issue areas with related sub-issues:

**1. What is the Competitive Solicitation Process?**

- a) When should the competitive solicitation process begin?
- b) How will the competitive solicitations be disseminated?
- c) What percentage of a utility's power requirements should be obtained through the competitive solicitation process?
- d) Should the percentage of a utility's power requirement obtained through the competitive solicitation process be established at one time or should it be phased-in?
- e) How will the competitive solicitation percentage be calculated?
- f) Will a utility be subject to penalties if it does not meet the competitive solicitation percentage?
- g) If a utility exceeds the annual competitive solicitation percentage, will the excess carry over to next year?
- h) What requirements, if any, should be imposed on the purchase of power that is obtained outside of the competitive solicitation process?

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

- i) What are the time frames for initiating and completing the steps of the competitive solicitation process?
  - j) Who will determine the components of each utility's portfolio of competitively solicited purchases?
  - k) What are the criteria and process for determining which offer(s) in response to competitive solicitations should be selected by a utility?
  - l) What mechanism will be in place for dispute resolutions related to competitive solicitations?
  - m) What protections will be in place to maintain the confidentiality of utility and participant information?
  - n) In the event that a supplier of power defaults on the obligation to provide the power, how will replacement energy be obtained?
  - o) How should the competitive solicitation process factor alternative delivery and transmission points?
  - p) Will the competitive solicitation process utilize the "Western Systems Power Pool umbrella agreement" or similar agreements?
- 2. What types of products will be subject to competitive solicitation?**
- a) Will the competitive solicitation process include financial and physical options?
  - b) Will the competitive solicitation percentage include standard block purchases through a broker or power pool?

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

- c) How will power produced by “must-run” generators be considered in the competitive solicitation process?
- d) Should the competitive solicitation percentage consist of block energy purchases, purchases shaped like the utility’s load or a combination thereof?
- 3. What will be the role of the Commission in the Competitive Solicitation Process?**
  - a) What will be the duties and responsibilities of the independent consultant?
  - b) Does the acceptance of the competitive solicitation process by the independent consultant constitute a finding of prudence for the costs incurred by the process?
  - c) What will be the scope, terms and effect of a utility’s purchase power adjustment clause?
- 4. What issues will affect the Participants to the competitive solicitation process?**
  - a) How will potential suppliers become qualified participants in the competitive solicitation process?
  - b) Will potential suppliers be required to obtain a certificate of convenience and necessity, permit or other authorization from the Commission?
  - c) Will potential suppliers be required to submit proposal fees or bonds?
  - d) What safeguards will be established to insure that “affiliate generators” are not discriminated against in the competitive solicitation process?

1 e) Will the Commission keep a list of qualified suppliers?

2 **IV. PROPOSED PROCEDURAL SCHEDULE.**

3 It is important that any final Commission rulings (or rules) regarding the  
4 competitive solicitation requirements that apply to TEP be based not only on generic  
5 (Arizona electric industry-wide) information, but also upon TEP-specific evidence. TEP's  
6 system and customers have unique characteristics that must be factored into the  
7 competitive solicitation process is going to be fair and realistic.  
8

9  
10 Therefore, TEP recommends that after the Commission has conducted a Track B  
11 "generic" hearing, a separate hearing be conducted to consider TEP-specific evidence and  
12 to adapt the competitive solicitation process thereto. Accordingly, TEP believes that the  
13 components of its procedural schedule are critical—even if the dates of the hearings must  
14 be extended. And, TEP believes that a variance to the Electric Competition Rules (with  
15 regard to divestiture of assets and competitive solicitation) is prudent to provide all parties  
16 with ample time to resolve the Track A and Track B issues and implement the  
17 Commission's standards.  
18

19  
20 TEP is also mindful that the Track A hearing is scheduled for June 14, 2002. TEP  
21 believes that it is important that the parties file Track B testimony after the Track A  
22 hearing has concluded in order to be able to respond to the evidence presented on the  
23 Track A issues.  
24  
25  
26  
27

1       **A.     Track B Generic Hearing**

2                Submittal of Issues and Procedure—May 13, 2002

3  
4                Procedural Schedule Issued—May 28, 2002

5  
6                Round 1 Generic Testimony—July 1, 2002

7  
8                Round 2 Generic Testimony—July 15, 2002

9                Procedural Conference—July 29, 2002

10  
11               Hearing—August 5, 2002

12  
13               Briefs—August 26, 2002

14  
15               Recommended Order – September 20, 2002

16               Order Re: Competitive Solicitation Process—October 21, 2002   Special Open

17 Meeting

18  
19       **B.     TEP-Specific Hearing**

20  
21               Testimony Re: TEP specific issues— approximately November 11, 2002 (three  
22 weeks after the Generic Track B Order)

23  
24               Rebuttal Testimony Re: TEP specific issues—November 25, 2002

25  
26               Procedural Conference—December 12, 2002

27

1 Hearing Re: TEP-specific issues—December 16, 2002

2 Briefs—January 13, 2003

3  
4 Recommended Order – February 3, 2003

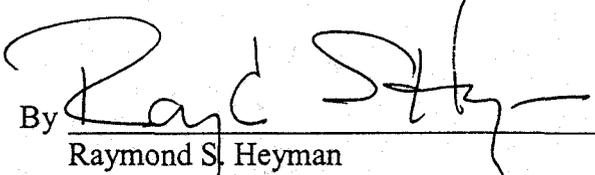
5  
6 Order Re: TEP-specific competitive solicitation process—February 20, 2003

7 Special Open Meeting

8  
9 TEP recognizes that, alternatively, the Commission may determine that it will  
10 amend the Electric Competition Rules subsequent to its rulings in the generic Track B  
11 proceeding. TEP submits that its specific data can be submitted either in the TEP-Specific  
12 Hearing or in the rulemaking proceeding and that the Electric Competition Rules can be  
13 amended in such a fashion as to apply specifically to the TEP system and customers.  
14 Accordingly, the time table TEP has set for the TEP Specific Hearing could be adapted for  
15 a rulemaking proceeding, if necessary.  
16

17  
18 Respectfully submitted this 13<sup>th</sup> day of May, 2002.

19  
20 **ROSHKA HEYMAN & DEWULF, PLC**

21  
22 By 

23 Raymond S. Heyman  
24 Michael W. Patten  
25 One Arizona Center  
26 400 East Van Buren Street, Suite 800  
27 Phoenix, Arizona 85004

Attorneys for Tucson Electric Power Company

ROSHKA HEYMAN & DEWULF, PLC  
ONE ARIZONA CENTER  
400 EAST VAN BUREN STREET - SUITE 800  
PHOENIX, ARIZONA 85004  
TELEPHONE NO 602-256-6100  
FACSIMILE 602-256-6800

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**ORIGINAL and 10 COPIES** filed  
May 13, 2002, with:

Docket Control  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

**COPIES** hand-delivered May 13, 2002, to:

Lyn A. Farmer, Esq.  
Chief Administrative Law Judge  
Hearing Division

ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Chairman William Mundell  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Commissioner Jim Irvin  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Commissioner Marc Spitzer  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Christopher Kempley, Esq.  
Chief Counsel, Legal Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

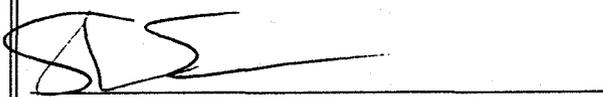
**ROSHKA HEYMAN & DEWULF, PLC**

ONE ARIZONA CENTER  
400 EAST VAN BUREN STREET - SUITE 800  
PHOENIX, ARIZONA 85004  
TELEPHONE NO 602-256-6100  
FACSIMILE 602-256-6800

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27

Ernest Johnson  
Director, Utilities Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

(See attached service list)



CONSOLIDATED ELECTRIC VARIANCE W/E-MAIL ADDRESSES- service list (4/23/02)

Lindy Funkhouser  
Scott S. Wakefield  
RUCO  
2828 N Central Ave, Suite 1200  
Phoenix, Arizona 85004

Michael A. Curtis  
William P. Sullivan  
Paul R. Michaud  
MARTINEZ & CURTIS, P.C.  
2712 North 7th Street  
Phoenix, Arizona 85006  
Attorneys for Arizona Municipal Power Users  
Association, Mohave Electric Cooperative, Inc.,  
Navopache Electric Cooperative, Inc., Reliant  
Resources, Inc. & Primesouth, Inc.  
[mcurtis401@aol.com](mailto:mcurtis401@aol.com)  
[wsullivan@martinezcurtis.com](mailto:wsullivan@martinezcurtis.com)  
[pmichaud@martinezcurtis.com](mailto:pmichaud@martinezcurtis.com)

Walter W. Meek, President  
ARIZONA UTILITY INVESTORS ASSOCIATION  
2100 N. Central Avenue, Suite 210  
Phoenix, Arizona 85004

Rick Gilliam  
Eric C. Guidry  
LAND AND WATER FUND OF THE ROCKIES  
ENERGY PROJECT  
2260 Baseline Road, Suite 200  
Boulder, Colorado 80302

Terry Frothun  
ARIZONA STATE AFL-CIO  
5818 N. 7th Street, Suite 200  
Phoenix, Arizona 85014-5811

Norman J. Furuta  
DEPARTMENT OF THE NAVY  
900 Commodore Drive, Building 107  
San Bruno, California 94066-5006

Barbara S. Bush  
COALITION FOR RESPONSIBLE ENERGY  
EDUCATION  
315 West Riviera Drive  
Tempe, Arizona 85252

Sam Defraw (Attn. Code 00I)  
Rate Intervention Division  
NAVAL FACILITIES ENGINEERING COMMAND  
Building 212, 4<sup>th</sup> Floor  
901 M Street, SE  
Washington, DC 20374-5018

Rick Lavis  
ARIZONA COTTON GROWERS ASSOCIATION  
4139 East Broadway Road  
Phoenix, Arizona 85040

Steve Brittle  
DON'T WASTE ARIZONA, INC.  
6205 South 12th Street  
Phoenix, Arizona 85040

COLUMBUS ELECTRIC COOPERATIVE, INC.  
P.O. Box 631  
Deming, New Mexico 88031

CONTINENTAL DIVIDE ELECTRIC  
COOPERATIVE  
P.O. Box 1087  
Grants, New Mexico 87020

DIXIE ESCALANTE RURAL ELECTRIC  
ASSOCIATION  
CR Box 95  
Beryl, Utah 84714

GARKANE POWER ASSOCIATION, INC.  
P.O. Box 790  
Richfield, Utah 84701

ARIZONA DEPT OF COMMERCE  
ENERGY OFFICE  
3800 North Central Avenue, 12th Floor  
Phoenix, Arizona 85012

ARIZONA COMMUNITY ACTION ASSOC.  
2627 N. 3rd Street, Suite 2  
Phoenix, Arizona 85004

TUCSON ELECTRIC POWER CO.  
Legal Dept - DB203  
220 W 6<sup>th</sup> Street  
P.O. Box 711  
Tucson, Arizona 85702-0711

A.B. Baardson  
NORDIC POWER  
6464 N. Desert Breeze Ct.  
Tucson, Arizona 85750-0846

Jessica Youle  
PAB300  
SALT RIVER PROJECT  
P.O. Box 52025  
Phoenix, Arizona 85072-2025

Joe Eichelberger  
MAGMA COPPER COMPANY  
P.O. Box 37  
Superior, Arizona 85273

Craig Marks  
CITIZENS UTILITIES COMPANY  
2901 N. Central Avenue, Suite 1660  
Phoenix, Arizona 85012-2736

Barry Huddleston  
DESTEC ENERGY  
P.O. Box 4411  
Houston, Texas 77210-4411

Steve Montgomery  
JOHNSON CONTROLS  
2032 West 4th Street  
Tempe, Arizona 85281

Terry Ross  
CENTER FOR ENERGY AND  
ECONOMIC DEVELOPMENT  
P.O. Box 288  
Franktown, Colorado 80116-0288

Clara Peterson  
AARP  
HC 31, Box 977  
Happy Jack, Arizona 86024

Larry McGraw  
USDA-RUS  
6266 Weeping Willow  
Rio Rancho, New Mexico 87124

Jim Driscoll  
ARIZONA CITIZEN ACTION  
5160 E. Bellevue Street, Apt. 101  
Tucson, AZ 85712-4828

William Baker  
ELECTRICAL DISTRICT NO. 6  
7310 N. 16<sup>th</sup> Street, Suite 320  
Phoenix, Arizona 85020

Robert Julian  
PPG  
1500 Merrell Lane  
Belgrade, Montana 59714

C. Webb Crockett  
Jay L. Shapiro  
FENNEMORE CRAIG, PC  
3003 N. Central Avenue, Suite 2600  
Phoenix, Arizona 85012-2913  
Attorneys for Panda Gila River, L.P.  
[Wcrockett@fclaw.com](mailto:Wcrockett@fclaw.com)  
[Jshapiro@fclaw.com](mailto:Jshapiro@fclaw.com)

Robert S. Lynch  
340 E. Palm Lane, Suite 140  
Phoenix, Arizona 85004-4529  
Attorney for Arizona Transmission Dependent  
Utility Group

K.R. Saline  
K.R. SALINE & ASSOCIATES  
Consulting Engineers  
160 N. Pasadena, Suite 101  
Mesa, Arizona 85201-6764

Carl Robert Aron  
Executive Vice President and COO  
ITRON, INC.  
2818 N. Sullivan Road  
Spokane, Washington 99216

Douglas Nelson  
DOUGLAS C. NELSON PC  
7000 N. 16th Street, Suite 120-307  
Phoenix, Arizona 85020-5547  
Attorney for Calpine Power Services

Lawrence V. Robertson Jr.  
MUNGER CHADWICK, PLC  
333 North Wilmot, Suite 300  
Tucson, Arizona 85711-2634  
Attorney for Southwestern Power Group, II, LLC;  
Bowie Power Station, LLC; Toltec Power Station,  
LLC; and Sempra Energy Resources  
[Lvrobertson@mungerchadwick.com](mailto:Lvrobertson@mungerchadwick.com)

Tom Wran  
Southwestern Power Group II  
[Twray@southwesternpower.com](mailto:Twray@southwesternpower.com)

Theodore E. Roberts  
SEMPRA ENERGY RESOURCES  
101 Ash Street, HQ 12-B  
San Diego, California 92101-3017  
[Troberts@sempra.com](mailto:Troberts@sempra.com)

Albert Sterman  
ARIZONA CONSUMERS COUNCIL  
2849 East 8th Street  
Tucson, Arizona 85716

Michael Grant  
GALLAGHER & KENNEDY  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
Attorneys for AEPSCO, Graham County Electric  
Cooperative, and Duncan Valley Electric  
Cooperative.  
[Mmg@gknet.com](mailto:Mmg@gknet.com)

Vinnie Hunt  
CITY OF TUCSON  
Department of Operations  
4004 S. Park Avenue, Building #2  
Tucson, Arizona 85714

Ryle J. Carl III  
INTERNATION BROTHERHOOD OF  
ELECTRICAL WORKERS, L.U. #1116  
750 S. Tucson Blvd.  
Tucson, Arizona 85716-5698

Carl Dabelstein  
CITIZENS COMMUNICATIONS  
2901 N. Central Ave., Suite 1660  
Phoenix, Arizona 85012

Roderick G. McDougall, City Attorney  
CITY OF PHOENIX  
Attn: Jesse Sears, Assistant Chief Counsel  
200 W Washington Street, Suite 1300  
Phoenix, Arizona 85003-1611

William J. Murphy  
CITY OF PHOENIX  
200 West Washington Street, Suite 1400  
Phoenix, Arizona 85003-1611  
[Bill.murphy@phoenix.gov](mailto:Bill.murphy@phoenix.gov)

Russell E. Jones  
WATERFALL ECONOMIDIS CALDWELL  
HANSHAW & VILLAMANA, P.C.  
5210 E. Williams Circle, Suite 800  
Tucson, Arizona 85711  
Attorneys for Trico Electric Cooperative, Inc.  
[Rjones@wechv.com](mailto:Rjones@wechv.com)

Christopher Hitchcock  
HITCHCOCK & HICKS  
P.O. Box 87  
Bisbee, Arizona 85603-0087  
Attorney for Sulphur Springs Valley  
Electric Cooperative, Inc.  
[Lawyers@bisbeelaw.com](mailto:Lawyers@bisbeelaw.com)

Andrew Bettwy  
Debra Jacobson  
SOUTHWEST GAS CORPORATION  
5241 Spring Mountain Road  
Las Vegas, Nevada 89150-0001

Barbara R. Goldberg  
OFFICE OF THE CITY ATTORNEY  
3939 Civic Center Blvd.  
Scottsdale, Arizona 85251

Bradford A. Borman  
PACIFICORP  
201 S. Main, Suite 2000  
Salt Lake City, Utah 84140

Timothy M. Hogan  
ARIZONA CENTER FOR LAW  
IN THE PUBLIC INTEREST  
202 E. McDowell Rd., Suite 153  
Phoenix, Arizona 85004

Marcia Weeks  
18970 N. 116th Lane  
Surprise, Arizona 85374

John T. Travers  
William H. Nau  
272 Market Square, Suite 2724  
Lake Forest, Illinois 60045

Timothy Michael Toy  
WINTHROP, STIMSON, PUTNAM & ROBERTS  
One Battery Park Plaza  
New York, New York 10004-1490

Chuck Miessner  
NEV SOUTHWEST LLC  
P.O. Box 711, Mailstop-DA308  
Tucson, Arizona 85702-0711

Billie Dean  
AVIDD  
P O Box 97  
Marana, Arizona 85652-0987

Raymond B. Wuslich  
WINSTON & STRAWN  
1400 L Street, NW  
Washington, DC 20005

Steven C. Gross  
PORTER SIMON  
40200 Truckee Airport Road  
Truckee, California 96161-3307  
Attorneys for M-S-R Public Power Agency

Donald R. Allen  
John P. Coyle  
DUNCAN & ALLEN  
1575 Eye Street, N.W., Suite 300  
Washington, DC 20005

Ward Camp  
PHASER ADVANCED METERING SERVICES  
400 Gold SW, Suite 1200  
Albuquerque, New Mexico 87102

Theresa Drake  
IDAHO POWER COMPANY  
P.O. Box 70  
Boise, Idaho 83707

Libby Brydolf  
CALIFORNIA ENERGY MARKETS  
NEWSLETTER  
2419 Bancroft Street  
San Diego, California 92104

Paul W. Taylor  
R W BECK  
2201 E. Camelback Rd Suite 115-B  
Phoenix, Arizona 85016-3433

James P. Barlett  
5333 N. 7<sup>th</sup> Street, Suite B-215  
Phoenix, Arizona 85014  
Attorney for Arizona Power Authority

Jay I. Moyes  
MOYES STOREY  
3003 N. Central Ave., Suite 1250  
Phoenix, Arizona 85012  
Attorneys for PPL Southwest Generation Holdings,  
LLC; PPL EnergyPlus, LLC and PPL Sundance  
Energy, LLC  
[Jimoyes@lawms.com](mailto:Jimoyes@lawms.com)

Stephen L. Teichler  
Stephanie A. Conaghan  
DUANE MORRIS & HECKSCHER, LLP  
1667 K Street NW, Suite 700  
Washington, DC 20006

Kathy T. Puckett  
SHELL OIL COMPANY  
200 N. Dairy Ashford  
Houston, Texas 77079

Andrew N. Chau  
SHELL ENERGY SERVICES CO., LLC  
1221 Lamar, Suite 1000  
Houston, Texas 77010

Peter Q. Nyce, Jr.  
DEPARTMENT OF THE ARMY  
JALS-RS Suite 713  
901 N. Stuart Street  
Arlington, Virginia 22203-1837

Michelle Ahlmer  
ARIZONA RETAILERS ASSOCIATION  
224 W. 2<sup>nd</sup> Street  
Mesa, Arizona 85201-6504

Dan Neidlinger  
NEIDLINGER & ASSOCIATES  
3020 N. 17<sup>th</sup> Drive  
Phoenix, Arizona 85015

Chuck Garcia  
PNM, Law Department  
Alvarado Square, MS 0806  
Albuquerque, New Mexico 87158

Sanford J. Asman  
570 Vinington Court  
Dunwoody, Georgia 30350-5710

Patricia Cooper  
AEP/CO/SSWEPCO  
P.O. Box 670  
Benson, Arizona 85602  
[Pcooper@aepnet.org](mailto:Pcooper@aepnet.org)

Steve Segal  
LEBOEUF, LAMB, GREENE, & MACRAE  
633 17<sup>th</sup> Street, Suite 2000  
Denver, Colorado 80202-3620

Holly E. Chastain  
SCHLUMBERGER RESOURCE  
MANAGEMENT SERVICES, INC.  
5430 Metric Place  
Norcross, Georgia 30092-2550

Leslie Lawner  
ENRON CORP  
712 North Lea  
Roswell, New Mexico 88201

Alan Watts  
Southern California Public Power Agency  
529 Hilda Court  
Anaheim, California 92806

Frederick M. Bloom  
Commonwealth Energy Corporation  
15991 Red Hill Avenue, Suite 201  
Tustin, California 92780

Margaret McConnell  
Maricopa Community Colleges  
2411 W. 14<sup>th</sup> Street  
Tempe, Arizona 85281-6942

Brian Soth  
FIRSTPOINT SERVICES, INC.  
1001 S.W. 5<sup>th</sup> Ave, Suite 500  
Portland, Oregon 97204

Jay Kaprosy  
PHOENIX CHAMBER OF COMMERCE  
201 N. Central Ave., 27<sup>th</sup> Floor  
Phoenix, Arizona 85073

Kevin McSpadden  
MILBANK, TWEED, HADLEY AND  
MCCLOY, LLP  
601 S. Figueroa, 30<sup>th</sup> Floor  
Los Angeles, California 90017

M.C. Arendes, Jr.  
C3 COMMUNICATIONS, INC.  
2600 Via Fortuna, Suite 500  
Austin, Texas 78746

Patrick J. Sanderson  
ARIZONA INDEPENDENT SCHEDULING  
ADMINISTRATOR ASSOCIATION  
P.O. Box 6277  
Phoenix, Arizona 85005-6277  
[Psanderson@az-isa.org](mailto:Psanderson@az-isa.org)

Roger K. Ferland  
QUARLES & BRADY STREICH LANG, L.L.P.  
Renaissance One  
Two North Central Avenue  
Phoenix, Arizona 85004-2391  
[Rferland@quarles.com](mailto:Rferland@quarles.com)

Charles T. Stevens  
ARIZONANS FOR ELECTRIC CHOICE &  
COMPETITION  
245 W. Roosevelt  
Phoenix, Arizona 85003

Mark Sirois  
ARIZONA COMMUNITY ACTION ASSOC.  
2627 N. Third Street, Suite 2  
Phoenix, Arizona 85004

Jeffrey Guldner  
Thomas L. Mumaw  
SNELL & WILMER  
400 E. Van Buren,  
One Arizona Center  
Phoenix, Arizona 85004-0001  
[Tmumaw@swlaw.com](mailto:Tmumaw@swlaw.com)

Steven J. Duffy  
RIDGE & ISAACSON PC  
3101 N. Central Avenue, Suite 740  
Phoenix, Arizona 85012

Greg Patterson  
5432 E. Avalon  
Phoenix, Arizona 85018  
[Gpatterson@aol.com](mailto:Gpatterson@aol.com)

John Wallace  
Grand Canyon State Electric Co-op  
120 N. 44<sup>th</sup> Street, Suite 100  
Phoenix, Arizona 85034-1822  
[Jwallace@gcseca.org](mailto:Jwallace@gcseca.org)

Steven Lavigne  
DUKE ENERGY  
4 Triad Center, Suite 1000  
Salt Lake City, Utah 84180

Dennis L. Delaney  
K.R. SALINE & ASSOC.  
160 N. Pasadena, Suite 101  
Mesa, Arizona 85201-6764

Kevin C. Higgins  
ENERGY STRATEGIES, LLC  
30 Market Street, Suite 200  
Salt Lake City, Utah 84101

Michael L. Kurtz  
BORHM KURTZ & LOWRY  
36 E. Seventh Street, Suite 2110  
Cincinnati, Ohio 45202  
[Mkurtzlaw@aol.com](mailto:Mkurtzlaw@aol.com)

David Berry  
P.O. Box 1064  
Scottsdale, Arizona 85252

William P. Inman  
Dept. of Revenue  
1600 W. Monroe, Room 911  
Phoenix, Arizona 85007  
[InmanW@revenue.state.az.us](mailto:InmanW@revenue.state.az.us)

Robert Baltes  
ARIZONA COGENERATION ASSOC.  
7250 N. 16<sup>th</sup> Street, Suite 102  
Phoenix, Arizona 85020-5270  
[Bbaltes@bvaeng.com](mailto:Bbaltes@bvaeng.com)

Jana Van Ness  
APS  
Mail Station 9905  
P.O. Box 53999  
Phoenix, Arizona 85072-3999  
[Jana.vanness@aps.com](mailto:Jana.vanness@aps.com)

David Couture  
TEP  
4350 E. Irvington Road  
Tucson, Arizona 85714

Kelly Barr  
Jana Brandt  
SRP  
Mail Station PAB211  
P.O. Box 52025  
Phoenix, Arizona 85072-2025  
[Kibarr@srpnet.com](mailto:Kibarr@srpnet.com)  
[Jkbrandt@srpnet.com](mailto:Jkbrandt@srpnet.com)

Randall H. Warner  
JONES SKELTON & HOCHULI PLC  
2901 N. Central Avenue, Suite 800  
Phoenix, Arizona 85012

John A. LaSota, Jr.  
MILLER LASOTA & PETERS, PLC  
5225 N. Central Ave., Suite 235  
Phoenix, Arizona 85012

Peter W. Frost  
Conoco Gas and Power Marketing  
600 N. Dairy Ashford, CH-1068  
Houston, Texas 77079

Joan Walker-Ratliff  
Conoco Gas and Power Marketing  
1000 S. Pine, 125-4 ST UPO  
Ponca City, Oklahoma 74602

Vicki G. Sandler  
C/o Linda Spell  
APS Energy Services  
P.O. Box 53901  
Mail Station 8103  
Phoenix, Arizona 85072-3901  
[Linda\\_spell@apses.com](mailto:Linda_spell@apses.com)

Lori Glover  
STIRLING ENERGY SYSTEMS  
2920 E. Camelback Rd., Suite 150  
Phoenix, Arizona 85016  
[Lglover@stirlingenergy.com](mailto:Lglover@stirlingenergy.com)

Jeff Schlegel  
SWEEP  
1167 Samalayuca Drive  
Tucson, Arizona 85704-3224  
[Schlegelj@aol.com](mailto:Schlegelj@aol.com)

Howard Geller  
SWEEP  
2260 Baseline Rd., Suite 200  
Boulder, Colorado 80302  
[Hgeller@swenergy.org](mailto:Hgeller@swenergy.org)

Mary-Ellen Kane  
ACAA  
2627 N. 3<sup>rd</sup> Street, Suite Two  
Phoenix, Arizona 85004  
[Mkane@azcaa.org](mailto:Mkane@azcaa.org)

Aaron Thomas  
AES NewEnergy  
350 S. Grand Avenue, Suite 2950  
Los Angeles, California 90071  
[Aaron.thomas@aes.com](mailto:Aaron.thomas@aes.com)

Theresa Mead  
AES NewEnergy  
P.O. Box 65447  
Tucson, Arizona 85728  
[Theresa.mead@aes.com](mailto:Theresa.mead@aes.com)

Peter Van Haren  
CITY OF PHOENIX  
Attn: Jesse W. Sears  
200 W. Washington Street, Suite 1300  
Phoenix, Arizona 85003-1611  
[Jesse.sears@phoenix.gov](mailto:Jesse.sears@phoenix.gov)

Robert Annan  
ARIZONA CLEAN ENERGY INDUSTRIES  
ALLIANCE  
6605 E. Evening Glow Drive  
Scottsdale, Arizona 85262  
[Annan@primenet.com](mailto:Annan@primenet.com)

Curtis L. Kebler  
RELIANT RESOURCES, INC.  
8996 Etiwanda Avenue  
Rancho Cucamonga, California 91739

Philip Key  
RENEWABLE ENERGY LEADERSHIP GROUP  
10631 E. Autumn Sage Drive  
Scottsdale, Arizona 85259  
[Keytaic@aol.com](mailto:Keytaic@aol.com)

Paul Bullis  
OFFICE OF THE ATTORNEY GENERAL  
1275 W. Washington Street  
Phoenix, Arizona 85007  
[Paul.bullis@ag.state.az.us](mailto:Paul.bullis@ag.state.az.us)

Laurie Woodall  
OFFICE OF THE ATTORNEY GENERAL  
15 S. 15<sup>th</sup> Avenue  
Phoenix, Arizona 85007  
[Laurie.woodall@ag.state.az.us](mailto:Laurie.woodall@ag.state.az.us)

Donna M. Bronski  
CITY OF SCOTTSDALE  
3939 N. Drinkwater Blvd  
Scottsdale, Arizona 85251  
[Dbronski@ci.scottsdale.az.us](mailto:Dbronski@ci.scottsdale.az.us)

Larry F. Eisenstat  
Frederick D. Ochsenhirt  
Michael R. Engleman  
DICKSTEIN SHAPIRO MORIN & OSHINSKY  
LLP  
2101 L Street, NW  
Washington, DC 20037  
[Eisenstatl@dsmo.com](mailto:Eisenstatl@dsmo.com)  
[Ochsenhirtf@dsmo.com](mailto:Ochsenhirtf@dsmo.com)

David A. Crabtree  
Dierdre A. Brown  
TECO POWER SERVICES CORP.  
P.O. Box 111  
Tampa, Florida 33602  
[Dacrabtree@tecoenergy.com](mailto:Dacrabtree@tecoenergy.com)  
[Dabrown@tecoenergy.com](mailto:Dabrown@tecoenergy.com)

Michael A. Trentel  
Patrick W. Burnett  
PANDA ENERGY INTERNATIONAL INC  
4100 Spring Valley, Suite 1010  
Dallas, Texas 75244  
[Michaelt@pandaenergy.com](mailto:Michaelt@pandaenergy.com)  
[Patb@pandaenergy.com](mailto:Patb@pandaenergy.com)

Jesse Dillon  
PPL Services Corp.  
2 N. Ninth Street  
Allentown, Pennsylvania 18101-1179  
[Jadillon@pplweb.com](mailto:Jadillon@pplweb.com)

Gary A. Dodge  
HATCH, JAMES & DODGE  
10 W. Broadway, Suite 400  
Salt Lake City, Utah 84101  
[Gdodge@hjdllaw.com](mailto:Gdodge@hjdllaw.com)

Christopher Kempley, Chief Counsel  
ARIZONA CORPORATION COMMISSION  
1200 W. Washington Street  
Phoenix, Arizona 85007

Ernest G. Johnson, Utilities Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

ARIZONA REPORTING SERVICE, INC.  
2627 N. Third Street, Suite Three  
Phoenix, Arizona 85004-1104