

ORIGINA



0000036863

32

BEFORE THE ARIZONA CC

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

COMMISSIONERS

MARC SPITZER, CHAIRMAN
JIM IRVIN
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON

2003 SEP -9 A 8:53

ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

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

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY'S REQUEST FOR A
VARIANCE OF CERTAIN REQUIREMENTS
OF A.A.C. R14-2-1606.

Docket No. E-01345A-01-0822

IN THE MATTER OF THE GENERIC
PROCEEDING CONCERNING THE ARIZONA
INDEPENDENT SCHEDULING
ADMINISTRATOR.

Docket No. E-00000A-01-0630

IN THE MATTER OF TUCSON ELECTRIC
POWER COMPANY'S APPLICATION FOR A
VARIANCE OF CERTAIN ELECTRIC
COMPETITION RULES COMPLIANCE
DATES.

Docket No. E-01933A-02-0069

Arizona Corporation Commission

DOCKETED

SEP 09 2003

DOCKETED BY

NOTICE OF FILING SUMMARY
OF TESTIMONY OF EDMOND A. BECK

Pursuant to AISA Hearing Procedural Order (dated June 18, 2003), Tucson Electric Power Company ("TEP"), through undersigned counsel, submits the attached Summary of the Testimony of Edmond A. Beck.

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

RESPECTFULLY SUBMITTED this 9th of September, 2003.

ROSHKA HEYMAN & DEWULF, PLC

By 

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

Attorneys for Tucson Electric Power Company

ORIGINAL and 21 COPIES of the
foregoing filed September 9, 2003, with:

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

TWO COPIES of the foregoing hand-delivered
September 9, 2003, to:

The Honorable Marc Spitzer, Chairman
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

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

The Honorable William Mundell, Commissioner
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

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 The Honorable Jeff Hatch-Miller, Commissioner
2 ARIZONA CORPORATION COMMISSION
3 1200 West Washington Street
4 Phoenix, Arizona 85007

5 The Honorable Mike Gleason, Commissioner
6 ARIZONA CORPORATION COMMISSION
7 1200 West Washington Street
8 Phoenix, Arizona 85007

9 **COPIES** of the foregoing hand-delivered
10 September 9, 2003, to:

11 Teena Wolfe, Esq.
12 ALJ, Hearing Division
13 ARIZONA CORPORATION COMMISSION
14 1200 West Washington Street
15 Phoenix, Arizona 85007

16 Jason Gelman, Esq.
17 Legal Division
18 ARIZONA CORPORATION COMMISSION
19 1200 West Washington Street
20 Phoenix, Arizona 85007

21 Ray Williamson
22 Utilities Division
23 ARIZONA CORPORATION COMMISSION
24 1200 West Washington Street
25 Phoenix, Arizona 85007

26 **COPIES** of the foregoing mailed September 9, 2003,
27 to those listed on the 06/24/03 ACC Service List.



**Summary of Direct Testimony of Edmond A. Beck
On Behalf of Tucson Electric Power Company**

**AISA Issues
September 9, 2003**

In my testimony, I state that, given the uncertain state of retail access in Arizona, Tucson Electric Power Company believes the Staff's recommendation (Option 4) – to maintain the AISA as it currently exists pending a review of the AISA in connection with the review of the Retail Electric Competition Rules – is reasonable, particularly given the history of the AISA and its current staffing level. Should the Commission choose to adopt the Staff's recommendation, TEP would urge the Commission to conduct a cost-benefit analysis of the AISA and to clearly state the specific expectations for the AISA.

I also point out that, alternatively, to the extent the Commission believes that the Protocols developed through the AISA and currently incorporated in the Affected Utilities' Open Access Transmission Tariffs (OATTs) can meet the perceived role of an ISA – with the exception of dispute resolution – then the Commission should consider suspending the AISA and ordering the Affected Utilities to rely upon the Protocols. TEP believes that the Protocols would enable retail competition to take place in Arizona. Moreover, a suspension of the AISA would not foreclose transmission access dispute resolution because there are options other than the AISA for such dispute resolution, assuming such disputes will even arise in the near term.