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BEFORE THE ARIZONA CORPORATION COMMISSION

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

ARIZONA CORPORATION COMMISSION  
DOCUMENT CONTROL

2003 SEP -9 A 11:4

RECEIVED

IN THE MATTER OF THE GENERIC ) DOCKET NO. E-00000A-02-0051  
PROCEEDING CONCERNING ELECTRIC )  
RESTRUCTURING ISSUES. )

IN THE MATTER OF ARIZONA PUBLIC ) DOCKET NO. E-01345A-01-0822  
SERVICE COMPANY'S REQUEST FOR A )  
VARIANCE OF CERTAIN REQUIREMENTS )  
OF A.A.C. R14-2-1606. )

IN THE MATTER OF THE GENERIC ) DOCKET NO. E-00000A-01-0630  
PROCEEDING CONCERNING THE )  
ARIZONA INDEPENDENT SCHEDULING )  
ADMINISTRATOR. )

IN THE MATTER OF TUCSON ELECTRIC ) DOCKET NO. E-01933A-02-0069  
POWER COMPANY'S APPLICATION FOR )  
A VARIANCE OF CERTAIN ELECTRIC )  
COMPETITION RULES COMPLIANCE )  
DATES. )

IN THE MATTER OF THE APPLICATION )  
OF TUCSON ELECTRIC POWER COMPANY )  
FOR APPROVAL OF ITS STRANDED COST )  
RECOVERY. )

Arizona Corporation Commission  
DOCKETED

SEP 09 2003

DOCKETED BY [Signature]

NOTICE OF FILING TESTIMONY SUMMARY  
OF LARRY D. HUFF

The Arizona Electric Power Cooperative gives notice of the filing of the testimony  
summary of Larry D. Huff in the AISA hearing matter.

GALLAGHER & KENNEDY, P.A.  
2575 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000

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RESPECTFULLY SUBMITTED this 9th day of September, 2003.

GALLAGHER & KENNEDY, P.A.

By:   
Michael M. Grant  
Attorneys for AEPCO

**ORIGINAL + 21 COPIES** of the foregoing  
Notice and Testimony Summary of Larry D.  
Huff filed this 9<sup>th</sup> day of September, 2003  
with Docket Control.

**COPY** of this Notice and Testimony Summary  
of Larry D. Huff hand-delivered this 9<sup>th</sup> day  
of September, 2003, to:

Ms. Teena Wolfe  
Administrative Law Judge  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

**TWO COPIES** of this Notice and the  
Testimony Summary of Larry D. Huff  
hand-delivered this 9<sup>th</sup> day of September,  
2003, to:

Chairman Marc Spitzer  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

Commissioner Jim Irvin  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

Commissioner William A. Mundell  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

1 Commissioner Jeff Hatch-Miller  
Arizona Corporation Commission  
2 1200 W. Washington  
Phoenix, AZ 85007

3  
4 Commissioner Mike Gleason  
Arizona Corporation Commission  
1200 W. Washington  
5 Phoenix, AZ 85007

6 **COPY** of this Notice and the Testimony  
Summary of Larry D. Huff mailed this  
7 9<sup>th</sup> day of September, 2003, to each party  
listed on the June 18, 2003 Procedural  
8 Order.

9 *Beth Oakley*  
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**BEFORE THE ARIZONA CORPORATION COMMISSION**

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

IN THE MATTER OF THE GENERIC ) DOCKET NO. E-00000A-02-0051  
PROCEEDING CONCERNING ELECTRIC )  
RESTRUCTURING ISSUES. )

IN THE MATTER OF ARIZONA PUBLIC ) DOCKET NO. E-0134A-01-0822  
SERVICE COMPANY'S REQUEST FOR A )  
VARIANCE OF CERTAIN REQUIREMENTS )  
OF A.A.C. R14-2-1606. )

IN THE MATTER OF THE GENERIC ) DOCKET NO. E-00000A-01-0630  
PROCEEDING CONCERNING THE )  
ARIZONA INDEPENDENT SCHEDULING )  
ADMINISTRATOR. )

IN THE MATTER OF TUCSON ELECTRIC ) DOCKET NO. E-01933A-02-0069  
POWER COMPANY'S APPLICATION FOR )  
A VARIANCE OF CERTAIN ELECTRIC )  
COMPETITION RULES COMPLIANCE )  
DATES. )

IN THE MATTER OF THE APPLICATION ) DOCKET NO. E-01933A-98-0471  
OF TUCSON ELECTRIC POWER COMPANY )  
FOR APPROVAL OF ITS STRANDED COST )  
RECOVERY. )

**Testimony Summary of**

**LARRY D. HUFF**

**On Behalf of  
Arizona Electric Power Cooperative, Inc.**

**September 9, 2003**

GALLAGHER & KENNEDY, P.A.  
2575 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000



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2. Dispute resolution. Mr. Huff states that the AISA is not needed for dispute resolution. It was never called upon to resolve a dispute in the early competitive stages in 2000 when disputes over transmission and protocol interpretation were most likely to occur; mediation and arbitration procedures exist in the OATT's of the Affected Utilities; the AISA dispute resolution process is not binding; and finally the FERC has set up a complete dispute resolution process from a telephone hotline procedure to a full complaint system.

3. Calculation of Available Transmission Capacity and operation of a statewide Oasis. As to calculation of ATC, Mr. Huff notes that OASIS sites operated by Affected Utilities include the amount of available transmission capacity so the AISA need not perform that function. As for the statewide Oasis, Mr. Huff notes that it would not be possible for the AISA to operate a statewide OASIS because the SRP and WAPA are not members of the AISA. Also, Mr. Huff notes that some 15 utilities are joining together to form a single, regional OASIS which will render this AISA anticipated function unnecessary.

4. Standardized reservation and scheduling procedures. Mr. Huff notes that procedures for reservation and scheduling are adequately covered in the OATT's and AISA involvement is not necessary.

5. Transmission planning. Mr. Huff notes that AISA involvement in this area would simply duplicate a number of other processes which are better positioned to address transmission needs including this Commission's biennial transmission assessment

1 process, the activities of the CATS and WATS groups, individual utilities' planning  
2 functions and the activities of the WECC.

3 Mr. Huff concludes that most of the AISA's functions are unnecessary, duplicate  
4 processes performed by others or have been overtaken by other entities and  
5 developments. He requests that the Commission enter its Order that AEPCO has  
6 fulfilled its Rule 1609 obligations in relation to the AISA.

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