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February 22, 2006

Jane L. Rodda
Administrative Law Judge
Hearing Division
Arizona Corporation Commission
400 W. Congress
Tucson, AZ 85701-1347

Re: *AEPCO and SWTC Requests to Extend the Filing Date for the Equity Management Plan Analyses; Docket Nos. E-01773A-04-0528 and E-04100A-04-0527; Decision Nos. 68071 and 68072*

Dear Ms. Rodda:

On behalf of the Arizona Electric Power Cooperative, Inc. ("AEPCO") and Southwest Transmission Cooperative, Inc. ("SWTC"), we request that a Procedural Order be entered extending the date for AEPCO and SWTC to file their Equity Management Plan Analyses from March 31 to May 31, 2006. We have discussed this request with Utilities Division Staff and Staff has no objection to the requested 60-day extension.

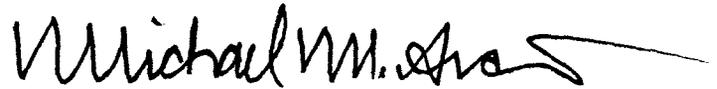
Both AEPCO and SWTC have completed, and their Boards of Directors have approved, the long-range financial forecasts which are the necessary first steps in conducting the analyses. The Cooperatives are assembling the data required to complete consideration of various rate and equity results under alternate scenarios, including the factors which the Commission directed be studied. Completion of that process is taking longer than expected—after which input needs to be obtained from the Cooperatives' Boards and the member distribution cooperatives before the analyses can be finalized. The project has also been unexpectedly delayed over the past two months, because of the need to prepare and process the Emergency Application to increase the short-term debt limit in Docket No. E-01773A-06-0007, which was approved by the Commission last week and also the Application to implement an FPPAC Adjustor on April 1, which is pending in Docket No. E-01773A-06-0047. The finance personnel involved in the equity analyses are the same individuals working on those matters.

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In light of the foregoing, we would ask that a Procedural Order be entered extending the date for AEPCO and SWTC to file their Equity Management Plan analyses to May 31, 2006. Your assistance in relation to this matter is appreciated.

Very truly yours,

GALLAGHER & KENNEDY, P.A.

A handwritten signature in black ink, appearing to read "Michael M. Grant", with a long horizontal flourish extending to the right.

By:

Michael M. Grant

MMG/plp
10421-36/15169-6/1333450

Original and 15 copies filed with Docket
Control this 22nd day of February, 2006.

cc (mailed): Jane L. Rodda
Christopher Kempley