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2006 MAY 24 P 12:42

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AZ CORP COMMISSION
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May 24, 2006

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

Re: *Delay in Filing the AEPCO and SWTC Equity Analyses;*
Docket Nos. E-01773A-04-0528 and E-04100A-04-0527;
Decision Nos. 68071 and 68072

Dear Ms. Rodda:

As you know, in Decision Nos. 68071 and 68072, the Commission instructed AEPCO and SWTC to update the assumptions in the capital plans filed in December 2002 and provide an analysis of certain equity issues. By Procedural Order dated April 6, 2006, you granted our request for an extension of the filing date to May 31, 2006.

AEPCO and SWTC have completed the equity analyses; however, they were not completed in time for their Boards of Directors to review the filings at their May Board meetings. Both Boards are scheduled to meet on June 13 and 14. The analyses will be presented to them at that time and filed with the Commission promptly thereafter.

We apologize for the slight delay in filing. If necessary for compliance purposes, we'd request a Procedural Order extending the filing date to no later than June 16. Your assistance is appreciated.

Very truly yours,

GALLAGHER & KENNEDY, P.A.

By:

Michael M. Grant

MMG/plp
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Jane L. Rodda
May 24, 2006
Page 2

Original and 15 copies filed with Docket
Control this 24th day of May, 2006.

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