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Arizona Corporation Commission

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AZ CORP COMMISSION  
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5 Attorneys for Citizens Communications Company

BEFORE THE ARIZONA CORPORATION COMMISSION

9 WILLIAM A. MUNDELL  
10 CHAIRMAN  
11 JIM IRVIN  
12 COMMISSIONER  
13 MARC SPITZER  
14 COMMISSIONER

DOCKET NO. E-01032C-00-0751

**CITIZENS COMMUNICATIONS  
COMPANY'S MOTION FOR LEAVE TO  
FILE A SURREPLY IN SUPPORT OF ITS  
NOTICE OF APPEARANCE OF  
SUBSTITUTE COUNSEL**

13 IN THE MATTER OF THE APPLICATION  
14 OF THE ARIZONA ELECTRIC DIVISION  
15 OF CITIZENS COMMUNICATIONS  
16 COMPANY TO CHANGE THE CURRENT  
17 PURCHASED POWER AND FUEL  
18 ADJUSTMENT CLAUSE RATE, TO  
19 ESTABLISH A NEW PURCHASED POWER  
20 AND FUEL ADJUSTMENT CLAUSE  
21 BANK, AND TO REQUEST APPROVED  
22 GUIDELINES FOR THE RECOVERY OF  
23 COSTS INCURRED IN CONNECTION  
24 WITH ENERGY RISK MANAGEMENT  
25 INITIATIVES.

Arizona Corporation Commission

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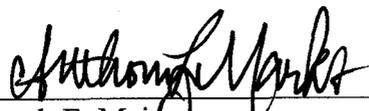
21 The collective briefs that RUCO, Staff and the Counties' filed on May 29 (collectively the  
22 "Responses") relating to Citizens' choice of Brown & Bain as its substitute counsel raise a number  
23 of arguments that those parties never raised before (or which are elaborated in a way that raises  
24 additional defects). Because Citizens has not had a fair opportunity to respond to these new and  
25 expanded arguments, it requests the opportunity to do so in a surreply, which has been submitted  
26 contemporaneously with this motion.

1 Dated: May 31, 2002.

2 Respectfully submitted,

3 BROWN & BAIN, P.A.

4  
5  
6 By

  
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11 Original and ten copies filed  
12 May 31, 2002, with:

13 Docket Control  
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Phoenix, Arizona 85007

15 Copy of the foregoing hand-delivered  
16 May 31, 2002, to:

17 Dwight Nodes  
18 Administrative Law Judge  
Hearing Division  
19 Arizona Corporation Commission  
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20 Chairman William Mundell  
21 Arizona Corporation Commission  
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22 Commissioner Jim Irvin  
23 Arizona Corporation Commission  
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24 Phoenix, Arizona 85007

25 Commissioner Mark Spitzer  
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