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Citizens Communications Company

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AZ CORP COMMISSION  
DOCUMENT CONTROL

Arizona Corporation Commission  
September 20, 2002

DOCKETED

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Ms. Lisa Ann Vandenberg  
Mr. John S. Thornton, Jr.  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

**RE: Citizens Communications Company, Arizona Gas Division -  
Application for a Rate Increase, Docket No. G-01032A-02-0598**

Dear Ms. Vandenberg and Mr. Thornton:

This letter accompanies Citizens Communications Company, Arizona Gas Division's ("AGD") response to the Staff's Letter of Deficiency that was issued on September 5, 2002. The documents that are being provided to you include revised schedules that address the deficiencies contained in Staff's Deficiency Exhibit. Along with the revised schedules, Citizens is also providing revised testimony for Mr. Raymond J. Mason, Mr. Kevin H. Doherty, and Mr. Anthony Apuzzo, so as to reflect the changes in the schedules that were referenced in the testimony.

To facilitate Staff's review of the Application, Citizens is providing both the corrected pages and a complete set of all standard filing requirement schedules. A listing that describes and/or identifies the revisions made to the originally filed standard filing requirement schedules is also provided. An electronic copy of the Revised AGD Rate Case Model, which contains all of the revisions, is also being submitted to Staff as a supplemental response to Arizona Corporation Commission Staff's First Set of Data Request, Data Request No. JST 1-02. In addition, a redlined copy of witness testimony that changed as a result of the revisions has been sent along with a "clean" copy of revised testimony. A supplemental response to Arizona Corporation Commission Staff's First Set of Data Request, Data Request No. JST 1-01 has been submitted today and includes these electronic files.

You will see in your review of these documents that Citizens has provided more revisions than Staff sought in the September 5th Deficiency Exhibit letter. As a result of the Staff's concerns, the Company has re-examined all of its schedules and calculations to ensure accuracy and clarity. We believe that we have met all the requirements of

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Mr. John Thornton  
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Corporation Commission rules, and that as of today, a full, complete and accurate filing has been made. This letter and the documents have been filed with Docket Control.

If the Staff has any questions or concerns, or needs additional information, please contact either of us: Deb Scott at 602-532-4433, or Ray Mason at 203-614-5066.

Sincerely,



Deborah R. Scott  
Associate General Counsel



Raymond C. Mason  
Director, Corporate Regulatory Affairs