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BEFORE THE ARIZONA CORPORATION CO

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COMMISSIONERS

JEFF HATCH-MILLER, Chairman
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
BARRY WONG

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AZ CORP COMMISSION
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Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR A HEARING TO DETERMINE THE
FAIR VALUE OF THE UTILITY PROPERTY
OF THE COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN
THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN, AND TO AMEND
DECISION NO. 67744

DOCKET NO. E-01345A-05-0816

MOTION TO CONSOLIDATE

Arizona Corporation Commission Staff ("Staff") hereby moves to consolidate Docket No. E-01345A-05-0826, Staff's inquiry into APS' operation of the Palo Verde Nuclear Generating Station, with Docket No. E-01345A-05-0816, APS' pending rate case.

On August 17, 2006, Staff filed its report in the Palo Verde inquiry. That report recommends certain disallowances related to APS' imprudent management of Palo Verde. The report also recommends that the Commission consider establishing a nuclear performance standard to govern APS' prospective operation of Palo Verde. Finally, the report recommends that APS be given an opportunity to inform the Commission regarding any remedies that it has pursued against vendors that supplied defective equipment to Palo Verde. All of these matters have direct implications for APS' pending rate case, and Staff believes that they can best be addressed in a rate case. In fact, some of these issues, such as the nuclear performance standard, may require consideration in a rate case in order to enable the Commission to impose prospective treatment.

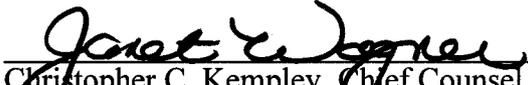
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1 For these reasons, Staff therefore requests that the Commission consolidate the Palo Verde
2 inquiry with APS' pending rate case.

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4 RESPECTFULLY SUBMITTED this 17th day of August 2006.

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7 Christopher C. Kempley, Chief Counsel
8 Janet Wagner, Senior Legal Counsel
9 Attorney, Legal Division
10 Arizona Corporation Commission
11 1200 West Washington Street
12 Phoenix, Arizona 85007
13 (602) 542-3402

14 Original and thirteen (13) copies
15 of the foregoing were filed this
16 17th day of August, 2006 with:

17 Docket Control
18 Arizona Corporation Commission
19 1200 West Washington Street
20 Phoenix, Arizona 85007

21 Copy of the foregoing will be mailed on the
22 18th day of August, 2006 to:

23 Thomas L. Mumaw
24 Karilee S. Ramaley
25 Pinnacle West Capital Corporation
26 P. O. Box 53999, MS 8695
27 Phoenix, AZ 85072-3999

28 Deborah R. Scott
Kimberly A. Grouse
Snell & Wilmer
One Arizona Center
400 East Van Buren
Phoenix, AZ 85004-2202

- 1 Dan Austin
Comverge, Inc.
2 6509 W. Frye Road, Suite 4
Chandler, AZ 85226
3
- 4 Scott S. Wakefield
Chief Counsel
Residential Utility Consumer Office
5 1110 West Washington, Suite 220
Phoenix, AZ 85007
6
- 7 Douglas V. Fant
Law Offices of Douglas V. Fant
3655 W. Anthem Drive, Suite A-109 PMB 411
8 Anthem, AZ 85086
Attorney for DEAA
9
- 10 Bill Murphy
Murphy Consulting
5401 North 25th Street
11 Phoenix, AZ 85016
Consultant to DEAA
12
- 13 Walter W. Meek, President
Arizona Utility Investors Association
2100 North Central, Suite 210
14 Phoenix, AZ 85004
- 15 Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
16 Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
17 Cincinnati, OH 45202
Attorneys for Kroger Co.
18
- 19 C. Webb Crockett
Patrick J. Black
Fennemore Craig, P.C.
20 3003 N. Central, Suite 2600
Phoenix, AZ 85012-2913
21 Attorneys for Phelps Dodge Mining Company
and Arizonans for Electric Choice and
22 Competition
- 23 Donna . Bronski
Deputy City Attorney
24 City Attorney's Office
3939 N. Drinkwater Blvd.
25 Scottsdale, AZ 85251
- 26 Robert W. Geake
Vice President and General Counsel
27 Arizona Water Company
P. O. Box 29006
28 Phoenix, AZ 85038-9006

- 1 Lieutenant Colonel Karen S. White
Chief, Air Force Utility Litigation Team
2 AFLSA/JACL-ULT
139 Barnes Drive
3 Tyndall AFB, FL 32403
- 4 Timothy M. Hogan
Arizona Center for Law in the Public Interest
5 202 East McDowell Road, Suite 153
Phoenix, AZ 85004
6 Attorneys for Western Resource Advocates
- 7 Tracy Spoon, Executive Director
Sun City Taxpayers Association
8 12630 North 103rd Avenue, Suite 144
Sun City, AZ 85351
9
- 10 Michael W. Patten
J. Matthew Derstine
Laura E. Sixkiller
11 Roshka DeWulf & Patten, PLC
One Arizona Center
12 400 East Van Buren, Suite 800
Phoenix, AZ 85004
13 Attorneys for UniSource Energy Services
- 14 Michelle Livengood
UniSource Energy Services
15 One South Church Street, Suite 200
Tucson, AZ 85702
16
- 17 Jim Nelson
12621 North 17th Place
Phoenix, AZ 85022
18
- 19 Lawrence V. Robertson, Jr.
Munger Chadwich, P.L.C.
P.O. Box 1448
20 Tubac, AZ 85646

- 21
22
23
24
25
26
27
28

