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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

2006 AUG 17 P 4: 52

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE INQUIRY INTO
THE FREQUENCY OF UNPLANNED
OUTAGES DURING 2005 AT PALO VERDE
NUCLEAR GENERATING STATION, THE
CAUSES OF THE OUTAGES, THE
PROCUREMENT OF REPLACEMENT
POWER AND THE IMPACT OF THE
OUTAGES ON ARIZONA PUBLIC SERVICE
COMPANY'S CUSTOMERS.

DOCKET NO. E-01345A-05-0826

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.

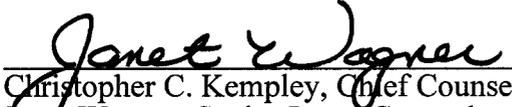
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Arizona Corporation Commission
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1 For these reasons, Staff therefore requests that the Commission consolidate the Palo Verde
2 inquiry with APS' pending rate case.

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4 RESPECTFULLY SUBMITTED this 17th day of August 2006.

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

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

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