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Arizona Electric Power Cooperative, Inc.

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September 3, 1996

Arizona Corporation Commission
DOCKETED

SEP 4 1996

Mr. Gary Yaquinto
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

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Re: Docket No. U-0000-94-165; Request for extension of time to submit comments on the Draft Rule to Introduce Retail Electric Competition ("Draft Rule")

Dear Mr. Yaquinto:

We received the Draft Rule on Thursday, August 29, 1996. In light of the Labor Day holiday, the requested response deadline of September 12 will afford us less than two weeks to comment on a proposed sweeping transformation of Arizona's electric industry.

As short as this time frame is generally, it impacts the AEPCO system even more because of our need to discuss and analyze the Draft Rule's impact on each of our five Arizona member distribution cooperatives as well as on AEPCO. Also, several key AEPCO and member distribution personnel are already occupied the weeks of September 2 and 9 with statewide, monthly AEPCO board and annual member information meeting responsibilities. In short, the requested response date of September 12 will simply not allow any meaningful analysis and comment opportunity.

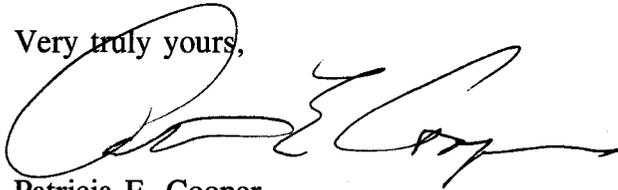


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We would request that you extend the response deadline to at least Friday, September 27, 1996.

Very truly yours,



Patricia E. Cooper
Corporate Counsel

Original and 10 copies filed with Docket Control.

c/Chairman Renz Jennings
Commissioner Marcia Weeks
Commissioner Carl Kunasek
Donald W. Kimball, Executive VP & General Manger
Michael M. Grant, Esq.