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BEFORE THE ARIZONA CORPORATION COMMISSION

2002 SEP 18 P 12:30

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

Arizona Corporation Commission

DOCKETED

SEP 18 2002

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY *CAR*

IN THE MATTER OF THE GENERIC
PROCEEDINGS CONCERNING ELECTRIC
RESTRUCTURING ISSUES

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY'S REQUEST FOR A
VARIANCE OF CERTAIN REQUIREMENTS
OF A.A.C. R14-2-1606

Docket No. E-01345A-01-0822

IN THE MATTER OF THE GENERIC
PROCEEDING CONCERNING THE
ARIZONA INDEPENDENT SCHEDULING
ADMINISTRATOR

Docket No. E-00000A-01-0630

IN THE MATTER OF TUCSON ELECTRIC
POWER COMPANY'S APPLICATION FOR A
VARIANCE OF CERTAIN ELECTRIC
COMPETITION RULES COMPLIANCE
DATES

Docket No. E-01933A-02-0069

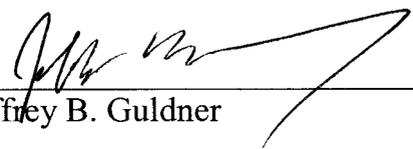
**RESPONSE OF ARIZONA PUBLIC SERVICE COMPANY
TO
STAFF REQUEST FOR PROCEDURAL ORDER**

Arizona Public Service Company ("APS" or "Company") hereby expresses its support for the Request for Procedural Order filed by the Arizona Corporation Commission ("Commission") Utilities Division Staff ("Staff") on September 16, 2002. Although the workshops are helpful in narrowing the issues, the Company agrees with Staff's conclusion that the likelihood of total consensus among such a diverse group (consumer representatives, incumbent utilities, merchant generators of varying types, distributed generation advocates, solar energy proponents, etc.) is small. Staff's proposed schedule, although ambitious, represents the best chance of meeting the Commission's direction in Decision No. 65154 and should therefore be adopted.

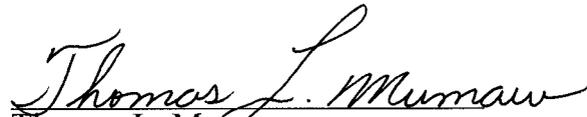
1 APS would further request that any Procedural Order issued in response to Staff's
2 Motion direct that all parties provide to each party of record two (2) copies of any work-
3 papers associated with their report/testimony concurrent with the filing of such
4 report/testimony. This will speed discovery and lend support to the tight schedule proposed in
5 the Motion.

6 RESPECTFULLY SUBMITTED THIS 18th day of September 2002.

7 SNELL & WILMER L.L.P.

8
9 
10 Jeffrey B. Guldner

11
12 and

13
14 
15 Thomas L. Murnaw
16 Senior Attorney
17 Pinnacle West Capital Corporation
18 Law Department

19 Attorneys for Arizona Public Service
20 Company

21 Original and fifteen copies of the
22 Foregoing filed this 18th day of
23 September, 2002, with:

24 Docket Control
25 Arizona Corporation Commission
26 1200 West Washington
27 Phoenix, AZ 85007

28 The foregoing mailed or e-mailed this
18th day of September, 2002, to:

All Track B parties of record

27 
28 Vicki L. Dicola