



0000069556

32R
ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

RECEIVED

JUN 11 2002

11:30 AM

ARIZONA CORP. COM.
TUCSON, AZ

IN THE MATTER OF THE GENERIC
PROCEEDINGS CONCERNING ELECTRIC
RESTRUCTURING ISSUES.

Docket No. ~~02-0051~~

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY'S REQUEST FOR
VARIANCE OF CERTAIN REQUIREMENTS
OF A.A.C. 4-14-2-1606

Docket No. E-01345A-01-0822

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

Docket No. E-00000A-01-0630

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

Docket No. E-01933A-98-0471

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

Docket No. E01933A-02-0069

Rebuttal Testimony Of William Monsen

On behalf of AES NewEnergy, Inc. and Strategic Energy, L.L.C.

TRACK A ISSUES

Arizona Corporation Commission

DOCKETED

JUN 12 2002

June 11, 2002

DOCKETED BY	CAR
-------------	-----

RECEIVED
JUN 12 P 12:21
ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

1 AES NewEnergy, Inc. and Strategic Energy L.L.C., by and through their attorneys,
2 hereby file the Rebuttal Testimony of William Monsen of MRW & Associates.

3 Respectfully submitted this 11th day of June 2002.

4
5 **LAW OFFICES OF DANIEL W. DOUGLASS**

6
7
8 By Daniel W. Douglass *dm*

9 Daniel W. Douglass
10 Gregory S.G. Klatt
11 Law Offices of Daniel W. Douglass
12 5959 Topanga Canyon Blvd. Suite 244
13 Woodland Hills, California 91367
14 Telephone (818) 596-2201
15 Facsimile (818) 346-6502

16 Attorneys for AES NewEnergy, Inc. and
17 Strategic Energy L.L.C.

18 **ORIGINAL and 18 COPIES** filed
19 June 11, 2002, with:

20 ARIZONA CORPORATION COMMISSION
21 400 West Congress
22 Tucson, AZ 85701-1347

23 **COPIES** mailed and/or sent via electronic mail without a copy of the service list on June 11, 2002
24 to:

25 (See Attached Service List)
26
27

1 **I. INTRODUCTION**

2 The primary purpose of this rebuttal testimony is to respond on behalf of AES
3 NewEnergy, Inc. ("AES NE") and Strategic Energy L.L.C. ("Strategic Energy") to the
4 initial testimony filed by Tucson Electric Power Company ("TEP") with regard to certain
5 "Track A" issues. In this testimony, I will focus on certain retail electric competition issues
6 raised in TEP's testimony, specifically, TEP's proposal that all residential customers and
7 commercial and industrial ("C&I") customers with loads under 3 MW be "excluded from
8 retail competition."¹

9 AES NE is America's leading retail electric provider, serving commercial and
10 industrial customers in California, Texas, Illinois, Ohio, Pennsylvania, Maryland,
11 Delaware, New Jersey, New York, Massachusetts, Rhode Island, New Hampshire and
12 Maine. On April 21, 1999, the Arizona Corporation Commission ("Commission") granted
13 NEV Southwest, L.L.C.'s² application for a Certificate of Convenience and Necessity
14 ("CCN") to supply competitive services as an electric service provider. AES NE is a
15 wholly-owned subsidiary of the AES Corporation (NYSE: AES), a leading global power
16 company comprised of competitive generation, distribution and retail businesses around the
17 world.

18 Strategic Energy is currently providing competitive retail energy services
19 throughout North America and is a potential energy service provider in Arizona and.
20 Founded in 1986, Strategic Energy serves over 19,000 customers across the nation and is
21 dedicated to serving end-users' energy needs.

22 The Commission should reject TEP's proposal to deny customer choice to all of
23 Arizona's residential customers and to C&I customers with load requirements less than 3
24 MW. If the Commission were to approve such an anti-competitive proposal, the end result
25 for retail competition in Arizona would be the same as if the Commission acted to repeal
26 the Retail Electric Competition Rules adopted in September 1999 -- it would be the death
27 knell to retail competition in Arizona. AES NE and Strategic Energy are gravely concerned
28 that TEP's proposal is a poorly disguised attempt to derail retail competition before it has
29 been given a fair opportunity to get off the ground. The Commission must do everything in

¹ Initial Testimony of James S. Pignatelli, p. 14.

² The initial filing was made under New Energy Ventures Southwest, L.L.C. with subsequent company name changes to NEV Southwest, L.L.C. and then NewEnergy Southwest, L.L.C. The company is in the process of having the CCN updated once more to reflect the current company name, AES NewEnergy, Inc.

1 its power to ensure the establishment of a healthy retail market to allow all Arizona
2 consumers to realize the benefits of electricity industry restructuring and to protect
3 themselves against incumbent retail market power. Providing all customers with the
4 freedom to choose their own electricity service provider is the very first step that must be
5 taken down the road towards creating a healthy retail market.

6
7 **II. TEP's Anti-Competitive Proposal**
8

9 TEP appears to believe customers with less than 3 MW demand do not need to be
10 provided with "choice" since these customers do not possess the knowledge and
11 sophistication to make their own energy decisions. This is evidenced by the following
12 statement by TEP witness DeConcini:

13 "I believe that customers below the 3 MW threshold would be better off
14 continuing to receive service from their incumbent utility under the existing
15 tariffs or contracts. For example, if TEP's current customers under 3 MW
16 remain on its system, this would insure that Residential and Small
17 Commercial customers can receive the benefit of TEP's long term, low cost
18 energy supply through 2008."³

19 TEP's assertion that residential and commercial customers would be better off with utility
20 service rather than with an opportunity to choose a competitive provider sounds like a
21 paternalistic presumption that these customers are not sophisticated or knowledgeable
22 enough to make their own decisions regarding an energy service provider. AES NE and
23 Strategic Energy are concerned that TEP's proposal represents an attempt to steer the
24 Commission and consumers back towards the utility-monopoly days when customers were
25 given no choice of electric provider.

26 As shown in the following table, there is ample evidence from other markets already
27 open to competition that, presented with choice, residential customers and C&I customers
28 of all sizes will exercise their choice to switch to a competitive retail provider:
29
30

³ Initial Testimony of Michael J. DeConcini, p. 11.

1

2

3

Direct Access Load and Customers as of April 30, 2002

State	Residential Load	Residential % of Load	Residential Customers	Residential % of Customers	C&I Load	C&I Percent of Load	C&I Customers	C&I Percent of Customers
OH ⁴	411,908 MWh	14%	621,716	18%	882,365 MWh	14%	25,960	5%
TX ⁵	755 MW	4%	150,929	3%	8,942MW	20%	51,715	5%
PA ⁶	1,154 MW	10%	512,380	8%	1,290 MW	7%	22,001	4%
CA ⁷	440,201 MWh	.8%	53,692	.6%	22,034,078 MWh	13%	29,430	7%

4

5 As one can plainly see from the customer switching data presented in the table above, both
6 residential and C&I customers are finding value when given a choice, i.e., voting with their
7 feet is the best signal of consumers' assessment of value. While definitions of commercial
8 and industrial customers vary from state to state, a substantial proportion, if not the
9 majority, of both customers and load in this category fall below the 3 MW threshold
10 proposed by TEP. Furthermore, evidence that consumers are finding value in retail
11 electricity competition is not limited to the United States alone. According to the United
12 Kingdom's Electricity Association, in England and Wales between 90-95% of customers
13 and load have switched to a competitive provider.

14 TEP's anti-competitive proposal, if adopted by the Commission, would deny all but
15 a handful of TEP's largest customers (>3 MW) the opportunity to choose a competitive
16 provider. This means that all of TEP's 318,976 residential customers⁸ and nearly all of its
17 31,962 non-residential customers⁹ with less than 3 MW demand, such as grocery stores,
18 schools and government buildings, office buildings, and retail businesses such as fast food
19 restaurants, gas stations, drug stores, bank branches, cafes, mini-marts, and dry cleaners, to

⁴ Source: Public Utilities Commission of Ohio

⁵ Source: Electric Reliability Council of Texas

⁶ Source: Pennsylvania Office of Consumer Advocate

⁷ Source: California Public Utilities Commission (CPUC). The CPUC suspended direct access as of September 20, 2001. At the peak of direct access in May 2000, residential and C&I load were 2.2% and 17.7% respectively.

⁸ UniSource Energy Corporation, Annual Report 2001, p.47.

⁹ Ibid, p. 47.

1 list a few, will be denied the ability to assess the benefits of competition and choose for
2 themselves. TEP is essentially attempting to eliminate choice for nearly 100% of the
3 residential customers in its service territory and the vast majority of its non-residential
4 customers

5
6 **III. Less Draconian Breakpoint for Restricting Customer Choice**

7
8 AES NE and Strategic Energy support the continued extension of choice to all
9 Arizona electric customers. However, in the event the Commission is inclined to restrict
10 customer choice based on demand, AES NE and Strategic Energy recommend the
11 Commission reject TEP's 3 MW threshold. As noted above, the breakpoint recommended
12 by TEP would effectively eliminate choice for the vast majority of customers in Arizona.

13 A less restrictive approach would set a breakpoint that offers choice to a broader
14 spectrum of commercial and industrial users, providing the customer base for an active
15 retail market and allowing businesses and industries to manage their energy costs. AES NE
16 and Strategic Energy suggest that a more inclusive alternative would be to set the
17 breakpoint at 20 kW, consistent with the 20 kW threshold embodied in the Transmission
18 and Ancillary Service charges under the current Direct Access Rate General Service
19 Schedule No. 10. Such a breakpoint would provide choice to customers currently receiving
20 service under Large Light and Power Rate No. 14, Large General Service Rate No. 13, and
21 those customers under General Service Rate No. 10 who meet the 20 kW threshold already
22 in place under that rate.

23 In addition, customers should be permitted to aggregate multiple accounts to meet
24 the minimum threshold. In fact, any threshold that the Commission might establish should
25 be accompanied by a provision allowing aggregation of accounts to meet the minimum
26 threshold. This would allow customers with multiple accounts or who share billing
27 procurement functions to participate in the direct access option if desired. For example,
28 operators of multiple retail establishments such as chain restaurants or service stations
29 could aggregate their accounts to meet the 20 kW threshold.

30
31 This concludes my testimony.

QUALIFICATIONS OF WILLIAM ALAN MONSEN

PROFESSIONAL EXPERIENCE

Principal
MRW & Associates, Inc.
(1989 - Present)

Specialist in electric utility generation planning, resource auctions, demand-side management (DSM) policy, power market simulation, power project evaluation, and evaluation of customer energy cost control options. Typical assignments include: analysis, testimony preparation and strategy development in large, complex regulatory intervention efforts regarding the economic benefits of utility mergers and QF participation in California's biennial resource acquisition process, analysis of markets for non-utility generator power in the western US, China, and Korea, evaluate the cost-effectiveness of onsite power generation options, sponsor testimony regarding the value of a major new transmission project in California, analyze the value of incentives and regulatory mechanisms in encouraging utility-sponsored DSM, negotiating non-utility generator power sales contract terms with utilities, and utility ratemaking.

Energy Economist
Pacific Gas & Electric Company
(1981 - 1989)

Responsible for analysis of utility and non-utility investment opportunities using PG&E's Strategic Analysis Model. Performed technical analysis supporting PG&E's Long Term Planning efforts. Performed Monte Carlo analysis of electric supply and demand uncertainty to quantify the value of resource flexibility. Developed DSM forecasting models used for long-term planning studies. Created an engineering-econometric modeling system to estimate impacts of DSM programs. Responsible for PG&E's initial efforts to quantify the benefits of DSM using production cost models.

Academic Staff
University of Wisconsin-Madison Solar Energy Laboratory
(1980 - 1981)

Developed simplified methods to analyze efficiency of passive solar energy systems. Performed computer simulation of passive solar energy systems as part of Department of Energy's System Simulation and Economic Analysis working group.

EDUCATION

M.S., Mechanical Engineering, University of Wisconsin-Madison, 1980.
B.S., Engineering Physics, University of California, Berkeley, 1977.

WILLIAM A. MONSEN
PREPARED TESTIMONY

1. CPUC Applications 90-08-066, 90-08-067, 90-09-001
Prepared Testimony with Aldyn W. Hoekstra regarding the California-Oregon Transmission Project for Toward Utility Rate Normalization (TURN) (November 29, 1990)
2. CPUC 90-10-003
Prepared Testimony with Mark A. Bachels regarding the Value of Qualifying Facilities and the Determination of Avoided Costs for the San Diego Gas & Electric Company for the Kelco Division of Merck & Company, Inc. (December 21, 1990)
3. CEC Docket No. 93-ER-94
Rebuttal Testimony regarding the Preparation of the 1994 Electricity Report for the Independent Energy Producers Association (December 10, 1993)
4. CPUC Rulemaking 94-04-031 and Investigation 94-04-032
Prepared Testimony regarding Transition Costs for The Independent Energy Producers (December 5, 1994)
5. D.T.E. 97-120
Direct Testimony regarding Nuclear Cost Recovery for The Commonwealth of Massachusetts Division of Energy Resources (October 23, 1998)
6. CPUC Application 97-12-039
Prepared Direct Testimony Evaluating an Auction Proposal by SDG&E on Behalf of The California Cogeneration Council (June 15, 1999)
7. CPUC Application 99-09-053
Prepared Direct Testimony regarding PG&E's Proposed Divestiture of its Hydroelectric Facilities on Behalf of the Independent Energy Producers Association (March 2, 2000)
8. CPUC Application 99-09-053
Prepared Rebuttal Testimony regarding PG&E's Proposed Divestiture of its Hydroelectric Facilities on Behalf of the Independent Energy Producers Association (March 16, 2000)
9. CPUC Application 99-10-025
Joint Testimony Regarding Auxiliary Load Power and Stand-by Metering Policy on Behalf of Duke Energy North America (July 3, 2000)
10. CPUC Application 99-03-014
Joint Testimony Regarding Auxiliary Load Power and Stand-by Metering Policy on Behalf of Duke Energy North America (September 29, 2000)
11. CPUC Rulemaking 99-11-022
Testimony of the Independent Energy Producers Association Regarding Short-Run Avoided Costs (May 7, 2001)

12. CPUC Rulemaking 99-11-022
Rebuttal Testimony of the Independent Energy Producers Association Regarding Short-Run Avoided Costs (May 30, 2001)
13. CPUC Application 01-08-020
Direct Testimony on Behalf of Bear Mountain, Inc. in the Matter of Southern California Water Company's Application to Increase Rates for Electric Service in the Bear Valley Electric Customer Service Area (December 20, 2001)
14. CPUC Application 00-10-045; 01-01-044
Direct Testimony of William A. Monsen on Behalf of The City of San Diego (May 29, 2002)
15. CPUC Rulemaking 01-10-024
Prepared Direct Testimony of William A. Monsen on Behalf of Independent Energy Producers and Western Power Trading Forum.
(May 31, 2002)
16. CPUC Rulemaking 01-10-024
Rebuttal Testimony of William A. Monsen on Behalf of Independent Energy Producers and Western Power Trading Forum
(June 6, 2002)

William A. Mundell, Chairman
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Jim Irvin, Commissioner
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Marc Spitzer, Commissioner
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Hercules Dellas
Aide to Chairman Mundell
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Kevin Barley
Aide to Commissioner Irvin
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Paul Walker
Aide to Commissioner Spitzer
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Ernest Johnson, Director
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Lyn Farmer
Chief Administrative Law Judge
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Christopher Kempley, Chief Counsel
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Jerry Smith
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Brian O'Neil, Executive Secretary
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Steve Olea, Asst. Director
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

CONSOLIDATED SERVICE LIST W/E-MAIL ADDRESSES-

Lindy Funkhouser
Scott S. Wakefield
RUCO
2828 N Central Ave, Suite 1200
Phoenix, Arizona 85004

Michael A. Curtis
William P. Sullivan
Paul R. Michaud
MARTINEZ & CURTIS, P.C.
2712 North 7th Street
Phoenix, Arizona 85006
Attorneys for Arizona Municipal Power
Users Association, Mohave Electric
Cooperative, Inc., Navopache Electric
Cooperative, Inc., Reliant Resources, Inc. &
Primesouth, Inc.
mcurtis401@aol.com
wsullivan@martinezcurtis.com
pmichaud@martinezcurtis.com

Walter W. Meek, President
ARIZONA UTILITY INVESTORS
ASSOCIATION
2100 N. Central Avenue, Suite 210
Phoenix, Arizona 85004

Rick Gilliam
Eric C. Guidry
LAND AND WATER FUND OF THE
ROCKIES
ENERGY PROJECT
2260 Baseline Road, Suite 200
Boulder, Colorado 80302

Terry Frothun
ARIZONA STATE AFL-CIO
5818 N. 7th Street, Suite 200
Phoenix, Arizona 85014-5811

Norman J. Furuta
DEPARTMENT OF THE NAVY
900 Commodore Drive, Building 107
San Bruno, California 94066-5006

Barbara S. Bush
COALITION FOR RESPONSIBLE
ENERGY EDUCATION
315 West Riviera Drive
Tempe, Arizona 85252

Sam Defraw (Attn. Code 00I)
Rate Intervention Division
NAVAL FACILITIES ENGINEERING
COMMAND
Building 212, 4th Floor
901 M Street, SE
Washington, DC 20374-5018

Rick Lavis
ARIZONA COTTON GROWERS
ASSOCIATION
4139 East Broadway Road
Phoenix, Arizona 85040

Steve Brittle
DON'T WASTE ARIZONA, INC.
6205 South 12th Street
Phoenix, Arizona 85040

COLUMBUS ELECTRIC COOPERATIVE,
INC.
P.O. Box 631
Deming, New Mexico 88031

CONTINENTAL DIVIDE ELECTRIC
COOPERATIVE
P.O. Box 1087
Grants, New Mexico 87020

DIXIE ESCALANTE RURAL ELECTRIC
ASSOCIATION
CR Box 95
Beryl, Utah 84714

GARKANE POWER ASSOCIATION, INC.
P.O. Box 790
Richfield, Utah 84701

ARIZONA DEPT OF COMMERCE
ENERGY OFFICE
3800 North Central Avenue, 12th Floor
Phoenix, Arizona 85012

ARIZONA COMMUNITY ACTION
ASSOC.
2627 N. 3rd Street, Suite 2
Phoenix, Arizona 85004

TUCSON ELECTRIC POWER CO.
Legal Dept – DB203
220 W 6th Street
P.O. Box 711
Tucson, Arizona 85702-0711

A.B. Baardson
NORDIC POWER
6464 N. Desert Breeze Ct.
Tucson, Arizona 85750-0846

Jessica Youle
PAB300
SALT RIVER PROJECT
P.O. Box 52025
Phoenix, Arizona 85072-2025

Joe Eichelberger
MAGMA COPPER COMPANY
P.O. Box 37
Superior, Arizona 85273

Craig Marks
CITIZENS UTILITIES COMPANY
2901 N. Central Avenue, Suite 1660
Phoenix, Arizona 85012-2736

Barry Huddleston
DESTEC ENERGY
P.O. Box 4411
Houston, Texas 77210-4411

Steve Montgomery
JOHNSON CONTROLS
2032 West 4th Street
Tempe, Arizona 85281

Terry Ross
CENTER FOR ENERGY AND
ECONOMIC DEVELOPMENT
P.O. Box 288
Franktown, Colorado 80116-0288

Clara Peterson
AARP
HC 31, Box 977
Happy Jack, Arizona 86024

Larry McGraw
USDA-RUS
6266 Weeping Willow
Rio Rancho, New Mexico 87124

Jim Driscoll
ARIZONA CITIZEN ACTION
5160 E. Bellevue Street, Apt. 101
Tucson, AZ 85712-4828

William Baker
ELECTRICAL DISTRICT NO. 6
7310 N. 16th Street, Suite 320
Phoenix, Arizona 85020

Robert Julian
PPG
1500 Merrell Lane
Belgrade, Montana 59714

C. Webb Crockett
Jay L. Shapiro
FENNEMORE CRAIG, PC
3003 N. Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913
Attorneys for Panda Gila River, L.P.
Wcrockett@fclaw.com
Jshapiro@fclaw.com

Robert S. Lynch
340 E. Palm Lane, Suite 140
Phoenix, Arizona 85004-4529
Attorney for Arizona Transmission
Dependent Utility Group

K.R. Saline
K.R. SALINE & ASSOCIATES
Consulting Engineers
160 N. Pasadena, Suite 101
Mesa, Arizona 85201-6764

Carl Robert Aron
Executive Vice President and COO
ITRON, INC.
2818 N. Sullivan Road
Spokane, Washington 99216

Douglas Nelson
DOUGLAS C. NELSON PC
7000 N. 16th Street, Suite 120-307
Phoenix, Arizona 85020-5547
Attorney for Calpine Power Services

Lawrence V. Robertson Jr.
MUNGER CHADWICK, PLC
333 North Wilmot, Suite 300
Tucson, Arizona 85711-2634
Attorney for Southwestern Power Group, II,
LLC; Bowie Power Station, LLC; Toltec
Power Station, LLC; and Sempra Energy
Resources
Lvrobertson@mungerchadwick.com

Tom Wran
Southwestern Power Group II
Twray@southwesternpower.com

Theodore E. Roberts
SEMPRA ENERGY RESOURCES
101 Ash Street, HQ 12-B
San Diego, California 92101-3017
Troberts@sempra.com

Albert Sterman
ARIZONA CONSUMERS COUNCIL
2849 East 8th Street
Tucson, Arizona 85716

Michael Grant
GALLAGHER & KENNEDY
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for AEPCO, Graham County
Electric Cooperative, and Duncan Valley
Electric Cooperative.
Mmg@gknet.com

Vinnie Hunt
CITY OF TUCSON
Department of Operations
4004 S. Park Avenue, Building #2
Tucson, Arizona 85714

Ryle J. Carl III
INTERNATION BROTHERHOOD OF
ELECTRICAL WORKERS, L.U. #1116
750 S. Tucson Blvd.
Tucson, Arizona 85716-5698

Carl Dabelstein
CITIZENS COMMUNICATIONS
2901 N. Central Ave., Suite 1660
Phoenix, Arizona 85012

Roderick G. McDougall, City Attorney
CITY OF PHOENIX
Attn: Jesse Sears, Assistant Chief Counsel
200 W Washington Street, Suite 1300
Phoenix, Arizona 85003-1611

William J. Murphy
CITY OF PHOENIX
200 West Washington Street, Suite 1400
Phoenix, Arizona 85003-1611
Bill.murphy@phoenix.gov

Russell E. Jones
WATERFALL ECONOMIDIS
CALDWELL HANSHAW &
VILLAMANA, P.C.
5210 E. Williams Circle, Suite 800
Tucson, Arizona 85711
Attorneys for Trico Electric Cooperative,
Inc.
Rjones@wechv.com

Christopher Hitchcock
HITCHCOCK & HICKS
P.O. Box 87
Bisbee, Arizona 85603-0087
Attorney for Sulphur Springs Valley
Electric Cooperative, Inc.
Lawyers@bisbeelaw.com

Andrew Bettwy
Debra Jacobson
SOUTHWEST GAS CORPORATION
5241 Spring Mountain Road
Las Vegas, Nevada 89150-0001

Barbara R. Goldberg
OFFICE OF THE CITY ATTORNEY
3939 Civic Center Blvd.
Scottsdale, Arizona 85251

Bradford A. Borman
PACIFICORP
201 S. Main, Suite 2000
Salt Lake City, Utah 84140

Timothy M. Hogan
ARIZONA CENTER FOR LAW
IN THE PUBLIC INTEREST
202 E. McDowell Rd., Suite 153
Phoenix, Arizona 85004

Marcia Weeks
18970 N. 116th Lane
Surprise, Arizona 85374

John T. Travers
William H. Nau
272 Market Square, Suite 2724
Lake Forest, Illinois 60045

Timothy Michael Toy
WINTHROP, STIMSON, PUTNAM &
ROBERTS
One Battery Park Plaza
New York, New York 10004-1490

Raymond S. Heyman
Michael W. Patten
ROSHKA HEYMAN & DEWULF, PLC
400 E. Van Buren, Suite 800
Phoenix, Arizona 85004
Attorneys for Tucson Electric Power Co.
Rheyman@rhd-law.com

Billie Dean
AVIDD
P O Box 97
Marana, Arizona 85652-0987

Raymond B. Wuslich
WINSTON & STRAWN
1400 L Street, NW
Washington, DC 20005

Steven C. Gross
PORTER SIMON
40200 Truckee Airport Road
Truckee, California 96161-3307
Attorneys for M-S-R Public Power Agency

Donald R. Allen
John P. Coyle
DUNCAN & ALLEN
1575 Eye Street, N.W., Suite 300
Washington, DC 20005

Ward Camp
PHASER ADVANCED METERING
SERVICES
400 Gold SW, Suite 1200
Albuquerque, New Mexico 87102

Theresa Drake
IDAHO POWER COMPANY
P.O. Box 70
Boise, Idaho 83707

Libby Brydolf
CALIFORNIA ENERGY MARKETS
NEWSLETTER
2419 Bancroft Street
San Diego, California 92104

Paul W. Taylor
R W BECK
14635 N. Kierland Blvd., Suite 130
Scottsdale, Arizona 85254-2769

James P. Barlett
5333 N. 7th Street, Suite B-215
Phoenix, Arizona 85014
Attorney for Arizona Power Authority

Jay I. Moyes
MOYES STOREY
3003 N. Central Ave., Suite 1250
Phoenix, Arizona 85012
Attorneys for PPL Southwest Generation
Holdings, LLC; PPL EnergyPlus, LLC and
PPL Sundance Energy, LLC
Jimoyes@lawms.com

Stephen L. Teichler
Stephanie A. Conaghan
DUANE MORRIS & HECKSCHER, LLP
1667 K Street NW, Suite 700
Washington, DC 20006

Kathy T. Puckett
SHELL OIL COMPANY
200 N. Dairy Ashford
Houston, Texas 77079

Andrew N. Chau
SHELL ENERGY SERVICES CO., LLC
1221 Lamar, Suite 1000
Houston, Texas 77010

Peter Q. Nyce, Jr.
DEPARTMENT OF THE ARMY
JALS-RS Suite 713
901 N. Stuart Street
Arlington, Virginia 22203-1837

Michelle Ahlmer
ARIZONA RETAILERS ASSOCIATION
224 W. 2nd Street
Mesa, Arizona 85201-6504

Dan Neidlinger
NEIDLINGER & ASSOCIATES
3020 N. 17th Drive
Phoenix, Arizona 85015

Chuck Garcia
PNM, Law Department
Alvarado Square, MS 0806
Albuquerque, New Mexico 87158

Sanford J. Asman
570 Vinington Court
Dunwoody, Georgia 30350-5710

Patricia Cooper
AEP/SSWEPCO
P.O. Box 670
Benson, Arizona 85602
Pcooper@aepnet.org

Steve Segal
LEBOEUF, LAMB, GREENE, &
MACRAE
633 17th Street, Suite 2000
Denver, Colorado 80202-3620

Holly E. Chastain
SCHLUMBERGER RESOURCE
MANAGEMENT SERVICES, INC.
5430 Metric Place
Norcross, Georgia 30092-2550

Leslie Lawner
ENRON CORP
712 North Lea
Roswell, New Mexico 88201

Alan Watts
Southern California Public Power Agency
529 Hilda Court
Anaheim, California 92806

Frederick M. Bloom
Commonwealth Energy Corporation
15991 Red Hill Avenue, Suite 201
Tustin, California 92780

Margaret McConnell
Maricopa Community Colleges
2411 W. 14th Street
Tempe, Arizona 85281-6942

Brian Soth
FIRSTPOINT SERVICES, INC.
1001 S.W. 5th Ave, Suite 500
Portland, Oregon 92704

Jay Kaprosy
PHOENIX CHAMBER OF COMMERCE
201 N. Central Ave., 27th Floor
Phoenix, Arizona 85073

Kevin McSpadden
MILBANK, TWEED, HADLEY AND
MCCLOY, LLP
601 S. Figueroa, 30th Floor
Los Angeles, California 90017

M.C. Arendes, Jr.
C3 COMMUNICATIONS, INC.
2600 Via Fortuna, Suite 500
Austin, Texas 78746

Patrick J. Sanderson
ARIZONA INDEPENDENT
SCHEDULING
ADMINISTRATOR ASSOCIATION
P.O. Box 6277
Phoenix, Arizona 85005-6277
Psanderson@az-isa.org

Roger K. Ferland
QUARLES & BRADY STREICH LANG,
L.L.P.
Renaissance One
Two North Central Avenue
Phoenix, Arizona 85004-2391
Rferland@quarles.com

Charles T. Stevens
ARIZONANS FOR ELECTRIC CHOICE &
COMPETITION
245 W. Roosevelt
Phoenix, Arizona 85003

Mark Sirois
ARIZONA COMMUNITY ACTION
ASSOC.
2627 N. Third Street, Suite 2
Phoenix, Arizona 85004

Jeffrey Guldner
Thomas L. Mumaw
SNELL & WILMER
400 E. Van Buren,
One Arizona Center
Phoenix, Arizona 85004-0001
Tmumaw@swlaw.com

Steven J. Duffy
RIDGE & ISAACSON PC
3101 N. Central Avenue, Suite 740
Phoenix, Arizona 85012

Greg Patterson
5432 E. Avalon
Phoenix, Arizona 85018
Gpatterson@aol.com

John Wallace
Grand Canyon State Electric Co-op
120 N. 44th Street, Suite 100
Phoenix, Arizona 85034-1822
Jwallace@gcseca.org

Steven Lavigne
DUKE ENERGY
4 Triad Center, Suite 1000
Salt Lake City, Utah 84180

Dennis L. Delaney
K.R. SALINE & ASSOC.
160 N. Pasadena, Suite 101
Mesa, Arizona 85201-6764

Kevin C. Higgins
ENERGY STRATEGIES, LLC
30 Market Street, Suite 200
Salt Lake City, Utah 84101

Michael L. Kurtz
BORHM KURTZ & LOWRY
36 E. Seventh Street, Suite 2110
Cincinnati, Ohio 45202
Mkurtzlaw@aol.com

David Berry
P.O. Box 1064
Scottsdale, Arizona 85252

William P. Inman
Dept. of Revenue
1600 W. Monroe, Room 911
Phoenix, Arizona 85007
InmanW@revenue.state.az.us

Robert Baltes
ARIZONA COGENERATION ASSOC.
7250 N. 16th Street, Suite 102
Phoenix, Arizona 85020-5270
Rbaltes@bvaeng.com

Jana Van Ness
APS
Mail Station 9905
P.O. Box 53999
Phoenix, Arizona 85072-3999
Jana.vanness@aps.com

David Couture
TEP
4350 E. Irvington Road
Tucson, Arizona 85714

Kelly Barr
Jana Brandt
SRP
Mail Station PAB211
P.O. Box 52025
Phoenix, Arizona 85072-2025
Kjbarr@srpnet.com
Jkbrandt@srpnet.com

Randall H. Warner
JONES SKELTON & HOCHULI PLC
2901 N. Central Avenue, Suite 800
Phoenix, Arizona 85012

John A. LaSota, Jr.
MILLER LASOTA & PETERS, PLC
5225 N. Central Ave., Suite 235
Phoenix, Arizona 85012

Peter W. Frost
Conoco Gas and Power Marketing
600 N. Dairy Ashford, CH-1068
Houston, Texas 77079

Joan Walker-Ratliff
Conoco Gas and Power Marketing
1000 S. Pine, 125-4 ST UPO
Ponca City, Oklahoma 74602
Joan.walker-ratliff@conoco.com

Vicki G. Sandler
C/o Linda Spell
APS Energy Services
P.O. Box 53901
Mail Station 8103
Phoenix, Arizona 85072-3901
Linda_spell@apses.com

Lori Glover
STIRLING ENERGY SYSTEMS
2920 E. Camelback Rd., Suite 150
Phoenix, Arizona 85016
Lglover@stirlingenergy.com

Jeff Schlegel
SWEEP
1167 Samalayuca Drive
Tucson, Arizona 85704-3224
Schlegelj@aol.com

Howard Geller
SWEEP
2260 Baseline Rd., Suite 200
Boulder, Colorado 80302
Hgeller@swenergy.org

Mary-Ellen Kane
ACAA
2627 N. 3rd Street, Suite Two
Phoenix, Arizona 85004
Mkane@azcaa.org

Aaron Thomas
AES NewEnergy
350 S. Grand Avenue, Suite 2950
Los Angeles, California 90071
Aaron.thomas@aes.com

Theresa Mead
AES NewEnergy
P.O. Box 65447
Tucson, Arizona 85728
Theresa.mead@aes.com

Peter Van Haren
CITY OF PHOENIX
Attn: Jesse W. Sears
200 W. Washington Street, Suite 1300
Phoenix, Arizona 85003-1611
Jesse.sears@phoenix.gov

Robert Annan
ARIZONA CLEAN ENERGY
INDUSTRIES ALLIANCE
6605 E. Evening Glow Drive
Scottsdale, Arizona 85262
Annan@primenet.com

Curtis L. Kebler
RELIANT RESOURCES, INC.
8996 Etiwanda Avenue
Rancho Cucamonga, California 91739

Philip Key
RENEWABLE ENERGY LEADERSHIP
GROUP
10631 E. Autumn Sage Drive
Scottsdale, Arizona 85259
Keytaic@aol.com

Paul Bullis
OFFICE OF THE ATTORNEY GENERAL
1275 W. Washington Street
Phoenix, Arizona 85007
Paul.bullis@ag.state.az.us

Laurie Woodall
OFFICE OF THE ATTORNEY GENERAL
15 S. 15th Avenue
Phoenix, Arizona 85007
Laurie.woodall@ag.state.az.us

Donna M. Bronski
CITY OF SCOTTSDALE
3939 N. Drinkwater Blvd
Scottsdale, Arizona 85251
Dbronski@ci.scottsdale.az.us

Larry F. Eisenstat
Frederick D. Ochsenhirt
Michael R. Engleman
DICKSTEIN SHAPIRO MORIN &
OSHINSKY LLP
2101 L Street, NW
Washington, DC 20037
Eisenstatl@dsmo.com
Ochsenhirtf@dsmo.com

David A. Crabtree
Dierdre A. Brown
TECO POWER SERVICES CORP.
P.O. Box 111
Tampa, Florida 33602
Dacrabtree@tecoenergy.com
Dabrown@tecoenergy.com

Michael A. Trentel
Patrick W. Burnett
PANDA ENERGY INTERNATIONAL INC
4100 Spring Valley, Suite 1010
Dallas, Texas 75244
Michaelt@pandaenergy.com
Patb@pandaenergy.com

Jesse Dillon

PPL Services Corp.
2 N. Ninth Street
Allentown, Pennsylvania 18101-1179
Jadillon@pplweb.com

Robert J. Metli, Esq.
Cheifetz & Iannitelli, P.A.
3238 North 16th Street
Phoenix, Arizona 85016
Attorneys for Citizens Communications
Company

Gary A. Dodge
HATCH, JAMES & DODGE
10 W. Broadway, Suite 400
Salt Lake City, Utah 84101
Gdodge@hjdllaw.com

ARIZONA REPORTING SERVICE, INC.
2627 N. Third Street, Suite Three
Phoenix, Arizona 85004-1104