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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

CARL J. KUNASEK
CHAIRMAN
JIM IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER

2000 NOV 15 P 2:17
AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION)
OF CITIZENS UTILITIES COMPANY FOR)
APPROVAL OF ITS PLAN FOR STRANDED)
STRANDED COST RECOVERY)

DOCKET NO. E-01032C-98-0474

IN THE MATTER OF THE FILING BY)
CITIZENS UTILITIES COMPANY OF)
UNBUNDLED AND STANDARD OFFER)
SERVICE TARIFFS PURSUANT TO A.A.C.)
R14-2-1606.)

DOCKET NO. E-01032C-97-0774

IN THE MATTER OF COMPETITION IN THE)
PROVISIONS OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA.)

DOCKET NO. RE-00000C-94-0165

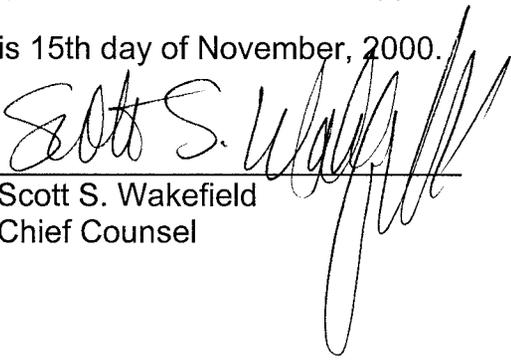
RUCO's Response to Citizens' Motion to Reopen Record and Request for Waiver

On October 16, 2000, Citizens Communications Company ("Citizens") filed a Motion to Reopen Record and a Request for Waiver of Certain Competition Rules. In the Request for Waiver, Citizens asks the Commission to grant a waiver from six requirements of the electric competition rules until 120 days after the Commission issues a final order in the above-captioned dockets. Citizens further requests that the Commission issue a final order in these dockets soon enough to allow Citizens to open its service territory to competition by May 1, 2001.

The Residential Utility Consumer Office ("RUCO") supports the request to reopen the record on Citizens' stranded cost application. Further, RUCO has no objection to the Commission granting Citizens a waiver from the six provisions of the electric competition rules. RUCO does not believe that Citizens' stranded cost application can be resolved 120 days prior

1 to May 1, 2001. RUCO does not, however, object to extending a waiver of the rules for 120
2 days after a final order is issued regarding Citizens' stranded cost application.

3 RESPECTFULLY SUBMITTED this 15th day of November, 2000.

4 
5 Scott S. Wakefield
6 Chief Counsel
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8

9 AN ORIGINAL AND TEN COPIES
10 of the foregoing filed this 15th day of
11 November, 2000 with:

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13 Arizona Corporation Commission
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17 hand delivered/faxed this 15th day of
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