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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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OCT 16 2000

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COMMISSIONER

WILLIAM A. MUNDELL

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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION OF
CITIZENS UTILITIES COMPANY FOR
APPROVAL OF ITS PLAN FOR 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-0000C-94-0165

MOTION TO REOPEN RECORD

Citizens Communications Company ("Citizens") asks the Administrative Law Judge to reopen the record to allow the parties to the begin renegotiations with the goal of modifying the Settlement Agreement that was previously filed in this docket. The purpose of these negotiations is to consider issues raised by the recent precipitous increase in Citizens' electric charges from Arizona Public Service Company. These issues are discussed further in Citizens' Request For Waiver Of Certain Competition Rules, also filed this day.

The parties to the Settlement Agreement have reviewed a draft of this letter and I am authorized to tell you that I am speaking on their behalf, as well as for Citizens. Also, no party is taking a position at this time as to whether any particular issue should be revisited, let alone how any issue should be resolved. If you have any questions, please call me, Chris Kempley, or Scott Wakefield.

1 RESPECTFULLY SUBMITTED on October 16, 2000.

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5 Craig A. Marks
6 Associate General Counsel
7 Citizens Communications Company
8 2901 N. Central Avenue, Suite 1660
9 Phoenix, Arizona 85012
10 (Signed October 13, 2000)

11 Original and ten copies filed on
12 October 16, 2000, with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 West Washington
16 Phoenix, Arizona 85007

17 Copies of the foregoing mailed/delivered
18 on October 16, 2000, to:

19 Jerry Rudibaugh
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12 Service List for RE-00000C-94-0165

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14 Joann Zychlewicz

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