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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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**MARC SPITZER, CHAIRMAN**  
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**JEFF HATCH-MILLER**  
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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

IN THE MATTER OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS STRANDED COST RECOVERY

Arizona Corporation Commission

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**NOTICE OF FILING SUMMARY**  
**OF TESTIMONY OF EDMOND A. BECK**

Pursuant to AISA Hearing Procedural Order (dated June 18, 2003), Tucson Electric Power Company ("TEP"), through undersigned counsel, submits the attached Summary of the Testimony of Edmond A. Beck.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> of September, 2003.

**ROSHKA HEYMAN & DEWULF, PLC**

By 

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**ORIGINAL and 21 COPIES** of the  
foregoing filed September 9, 2003, with:

Docket Control  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

**TWO COPIES** of the foregoing hand-delivered  
September 9, 2003, to:

The Honorable Marc Spitzer, Chairman  
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1200 West Washington Street  
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The Honorable Jim Irvin, Commissioner  
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The Honorable William Mundell, Commissioner  
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The Honorable Jeff Hatch-Miller, Commissioner  
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The Honorable Mike Gleason, Commissioner  
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**COPIES** of the foregoing mailed September 9, 2003,  
to those listed on the 06/24/03 ACC Service List.



**Summary of Direct Testimony of Edmond A. Beck  
On Behalf of Tucson Electric Power Company**

**AISA Issues  
September 9, 2003**

In my testimony, I state that, given the uncertain state of retail access in Arizona, Tucson Electric Power Company believes the Staff's recommendation (Option 4) – to maintain the AISA as it currently exists pending a review of the AISA in connection with the review of the Retail Electric Competition Rules – is reasonable, particularly given the history of the AISA and its current staffing level. Should the Commission choose to adopt the Staff's recommendation, TEP would urge the Commission to conduct a cost-benefit analysis of the AISA and to clearly state the specific expectations for the AISA.

I also point out that, alternatively, to the extent the Commission believes that the Protocols developed through the AISA and currently incorporated in the Affected Utilities' Open Access Transmission Tariffs (OATTs) can meet the perceived role of an ISA – with the exception of dispute resolution – then the Commission should consider suspending the AISA and ordering the Affected Utilities to rely upon the Protocols. TEP believes that the Protocols would enable retail competition to take place in Arizona. Moreover, a suspension of the AISA would not foreclose transmission access dispute resolution because there are options other than the AISA for such dispute resolution, assuming such disputes will even arise in the near term.