



ORIGINAL
**Grand Canyon State Electric
 Cooperative Association, Inc.**

Your Touchstone Energy® Cooperatives 



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February 19, 2008 AZ CORP COMMISSION
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Docket Control
 Arizona Corporation Commission
 1200 W. Washington
 Phoenix, AZ 85007

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Re: *Electric Cooperatives' Comments on the Resource Planning (Docket No. E-00000E-05-0431)*

Dear Sir/Madam:

Duncan Valley Electric Cooperative, Inc., Graham County Electric Cooperative, Inc., Mohave Electric Cooperative, Inc., Navopache Electric Cooperative, Inc. ("Navopache"), Sulphur Springs Valley Electric Cooperative, Inc. and Trico Electric Cooperative, Inc. (collectively "the Cooperatives") submit these comments and responses to Staff's Questions on Resource Planning in Docket No. E-00000E-05-0431.

In summary, the Cooperatives support the Arizona Electric Power Cooperative, Inc. ("AEPSCO") comments on resource planning filed on February 19, 2008 and believe that the current, but mostly suspended, Integrated Resource Planning ("IRP") Rules and process should not be reinstated. Alternatively, as described in the "Resource Planning in Western Jurisdictions" matrix, the cooperatives suggest that, as in Colorado, distribution cooperatives be exempted from the process and AEPSCO be subject only to reporting requirements. If, however, the Commission

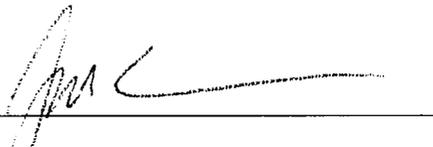
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believes some IRP procedure is needed, a possible alternate approach would be to require the filing periodically—perhaps on a three- to four-year cycle—of information concerning utility supply-side plans, together with supporting detail as necessary. Those individual products could then be collectively reviewed in a process and format similar to the Commission’s Biennial Transmission Assessment (“BTA”).

Very truly yours,

GRAND CANYON STATE ELECTRIC
COOPERATIVE ASSOCIATION

By



John Wallace
Director, Regulatory and Strategic Services

Original and 13 copies filed with Docket
Control this 19th day of February, 2008, with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007