

ORIGINAL



0000083003

BEFORE THE ARIZONA CORPORATION COMMISSION

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
28

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

DOCKETED

DEC 19 2001

2001 DEC 19 A 11:00

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY [Signature]

IN THE MATTER OF THE APPLICATION OF)
THE ARIZONA ELECTRIC DIVISION OF)
CITIZENS COMMUNICATIONS COMPANY)
TO CHANGE THE CURRENT PURCHASED)
POWER AND FUEL ADJUSTMENT CLAUSE)
RATE, TO ESTABLISH A NEW PURCHASED)
POWER AND FUEL ADJUSTMENT CLAUSE)
BANK, AND TO REQUEST APPROVED)
GUIDELINES FOR THE RECOVERY OF COSTS)
INCURRED IN CONNECTION WITH ENERGY)
RISK MANAGEMENT INITIATIVES)

DOCKET NO. E-01032C-00-0751

MOTION TO EXTEND TIME
FOR SUBMITTING STAFF
REPORT OR TESTIMONY

Pursuant to the Procedural Order dated November 15, 2001, Staff's Report and/or testimony and associated exhibits are due for filing on by January 15, 2002. Staff will be unable to meet the current filing date. Therefore, Staff requests that the filing date of the Staff Report be delayed until February 8, 2002.

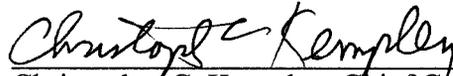
Staff has been diligently conducting discovery since the issuance of the Procedural Order. However, in many instances, Citizens answers to Staff data requests have either been non-responsive to Staff's requests for information and data requests, or have supplied information which does not comply with Staff's requests. The continued delays experienced by Staff in receiving the information necessary for preparation of its testimony, has jeopardized Staff's ability to adequately prepare its testimony prior to the January 15, 2002 filing deadline.

Based on our review of the Revised Procedural Order, Staff believes that some other procedural dates may need to be slightly extended to accommodate Staff's request.

...
...
...
...

1 Wherefore, Staff requests that the presiding officer grant Staff's request to delay filing of
2 the Staff Report and/or testimony in this case until February 8, 2002.

3 RESPECTFULLY SUBMITTED this 19th day of December, 2001.

4
5 

6 Christopher C. Kempley, Chief Counsel
7 Stephen Gibelli, Attorney
8 Legal Division
9 Arizona Corporation Commission
10 1200 West Washington Street
11 Phoenix, Arizona 85007
12 (602) 542-3402

13
14
15 The original and ten copies of the
16 foregoing filed this 19th day of
17 December, 2001, with:

18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington Street
21 Phoenix, Arizona 85007

22
23 COPIES of the foregoing were mailed
24 hand-delivered this 19th day of December,
25 2001 to:

26 Michael M. Grant
27 Todd C. Wiley
28 GALLAGHER & KENNEDY
2575 E. Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for Citizens Communications Company

Daniel W. Pozefsky
RUCO
2828 N. Central Ave., Suite 1200
Phoenix, Arizona 85004

Christine L. Nelson
Deputy County Attorney
P.O. Box 7000
Kingman, Arizona 86402

Walter W. Meek
AUJA
2100 N. Central Ave., Suite 210
Phoenix, Arizona 85004

...

1 Ernest G. Johnson, Director
Utilities Division
2 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
3 Phoenix, Arizona 85007

4 Lyn Farmer, Director
Hearing Division
5 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
6 Phoenix, Arizona 85007

7 
8
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28