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A subsidiary of Pinnacle West Capital Corporation



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April 22, 2008

Ernest Johnson  
Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Arizona Corporation Commission  
**DOCKETED**

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Re: Extension of Sufficiency Review Period  
Docket No. E-01345A-08-0172

Dear Mr. Johnson:

As you know, Arizona Public Service Company ("APS" or "Company") filed a rate application with the Commission on March 24, 2008. Arizona Administrative Code R14-2-103(7) ("Rule 103(7)") requires the Staff of the Arizona Corporation Commission to review the Company's rate filing and, within a period of 30 days from March 24, 2008 (by April 23, 2008), to provide a notice to APS that its filing "either is in compliance with the Commission's requirements or is deficient." The Rule further provides that if Staff fails to file any notice within the 30-day period, "the filing shall be deemed accepted after the 31<sup>st</sup> day." (*Id.*)

This letter confirms that APS agrees to extend the 30-day review period provided for in Rule 103(7) by an additional 15 days (thereby giving the parties until May 8, 2008 to continue to address the sufficiency issues raised by the Company's application), including a corresponding waiver of the provision in Rule 103(7) that the filing shall be deemed accepted after the 30th day. It is further understood that this letter is not intended to limit Staff's ability to make any filing or determination regarding the sufficiency of this matter at the expiration of the fifteen days or May 8, 2008.

Sincerely,

Jeff Guldner

cc: Docket Control  
Terri Ford  
Janet Wagner

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