

ORIGINAL

LR/2/08



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7 Attorneys for Intervenor IBEW Local 1116

Arizona Corporation Commission  
**DOCKETED**

JUN 13 2008

BEFORE THE ARIZONA  
 CORPORATION COMMISSION

DOCKETED BY	<i>MM</i>
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12 IN THE MATTER OF THE  
 13 APPLICATION FOR TUCSON  
 14 ELECTRIC POWER COMPANY FOR  
 THE ESTABLISHMENT OF JUST  
 15 AND REASONABLE RATES AND  
 16 CHANGES DESIGNED TO REALIZE  
 A REASONABLE RATE OF RETURN  
 ON THE FAIR VALUE OF ITS  
 17 OPERATIONS THROUGHOUT THE  
 STATE OF ARIZONA

Docket No. E-01933A-07-042<sup>02</sup>~~0~~

18 IN THE MATTER OF THE FILING  
 19 BY TUCSON ELECTRIC POWER  
 20 COMPANY TO AMEND DECISION  
 NO. 62013

Docket No. E-01933A-05-0650

INTERVENOR IBEW LOCAL 1116'S  
 MOTION FOR AN ENLARGEMENT OF TIME (First Request)

23 Pursuant to A.A.C. R14-3-101(A) and, in turn, Rule  
 24 6(b)(1), Ariz.R.Civ.P., Local Union 1116, International  
 25 Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local  
 26 1116") hereby requests that the Administrative Law Judge  
 27 enlarge the time allowed for it - and only it - to file its  
 28

1 direct testimony in support of the settlement agreement from  
2 today, June 11, 2008, to Thursday, June 19, 2008. The  
3 Residential Utility Consumer Office ("RUCO"), the only party  
4 who, apparently, will be actively opposing the adoption of  
5 the settlement agreement, does not oppose this motion.

6 The extension is necessary in light of the fact that  
7 undersigned counsel has, in addition to all of his other  
8 work, been preoccupied the past two weeks with a work-  
9 related trip to San Antonio, Texas and preparing for two  
10 separate hearings over the next seven (7) days involving a  
11 large dispute between the Office and Professional Employees  
12 International Union, AFL-CIO, CLC and PHI, Inc. Cf.

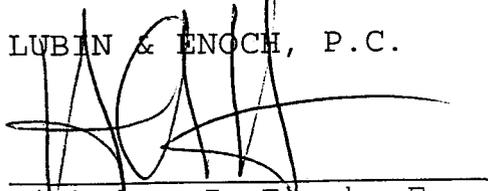
13 *Sorensen v. PHI, Inc.*, 2007 U.S. Dist. LEXIS 92894 (W.D. La.  
14 2007). As a consequence of these other matters, undersigned  
15 counsel has simply been unable to complete IBEW Local 1116's  
16 forthcoming testimony by today's deadline.

17 Given the relatively limited scope of IBEW Local 1116's  
18 forthcoming testimony, IBEW Local 1116 does not believe that  
19 this request will interfere with either the commencement of  
20 the hearing in this case or the ability of dissenting views  
21 to rebut the points to be raised in IBEW Local 1116's  
22 forthcoming testimony.

23 **WHEREFORE**, it is respectfully requested that the  
24 Administrative Law Judge issue an Order enlarging the time  
25 allowed for IBEW Local 1116 to file its direct testimony in  
26 support of the settlement agreement to Thursday, June 19,  
27 2008.

1 RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of June, 2008.

2 LUBIN & ENOCH, P.C.

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4   
5 Nicholas J. Enoch, Esq.

6 Attorney for Intervenor IBEW Local 1116

7 ORIGINAL and thirteen (13) copies  
8 of IBEW Local 1116's Motion filed  
9 this 11<sup>th</sup> day of June, 2008, with:

10 Arizona Corporation Commission  
11 Docket Control Center  
12 1200 West Washington Street  
13 Phoenix, Arizona 85007-2996

14 Copies of the foregoing transmitted  
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16 same date to:

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