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1 LUBIN & ENOCH, P.C.
2 Nicholas J. Enoch
3 State Bar No. 016473
4 Jarrett J. Haskovec
5 State Bar No. 023926
6 349 North Fourth Avenue
7 Phoenix, Arizona 85003
8 Telephone: (602) 234-0008
9 Facsimile: (602) 626-3586
10 E-mail: nicholas.enoch@azbar.org

11 Attorneys for Intervenor IBEW Local 1116

BEFORE THE ARIZONA

CORPORATION COMMISSION

12 IN THE MATTER OF THE
13 APPLICATION FOR TUCSON
14 ELECTRIC POWER COMPANY FOR
15 THE ESTABLISHMENT OF JUST
16 AND REASONABLE RATES AND
17 CHANGES DESIGNED TO REALIZE
18 A REASONABLE RATE OF RETURN
19 ON THE FAIR VALUE OF ITS
20 OPERATIONS THROUGHOUT THE
21 STATE OF ARIZONA

Docket No. E-01933A-07-~~0420~~
0402

22 IN THE MATTER OF THE FILING
23 BY TUCSON ELECTRIC POWER
24 COMPANY TO AMEND DECISION
25 NO. 62013

Docket No. E-01933A-05-0650

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

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

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.

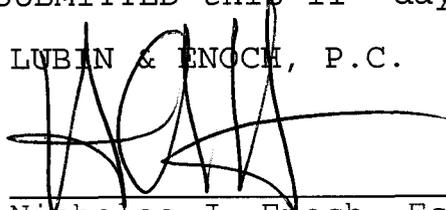
6 The extension is necessary in light of the fact that
7 undersigned counsel has, in addition to all of his other
8 work, been preoccupied the past two weeks with a work-
9 related trip to San Antonio, Texas and preparing for two
10 separate hearings over the next seven (7) days involving a
11 large 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 11th day of June, 2008.

2 LUBIN & ENOCH, P.C.

3 
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 11th 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
15 electronically/mailed this
16 same date to:

17 Jane L. Rodda, Administrative Law Judge
18 Hearing Division
19 Arizona Corporate Commission
20 400 West Congress, Ste. 218
21 Tucson, Arizona 85701-1352

22 Michael W. Patten, Esq.
23 Roshka, DeWulf & Patten, PLC
24 400 East Van Buren Street, Ste. 800
25 Phoenix, Arizona 85004
26 Co-counsel for TEP

27 Raymond S. Heyman, Esq.
28 Michelle D. Livengood, Esq.
29 UniSource Energy Corporation
30 One South Church Avenue, Ste. 200
31 Tucson, Arizona 85701
32 Co-counsel for TEP

33 Christopher C. Kempley, Esq.
34 Chief Counsel, Legal Division
35 Arizona Corporation Commission
36 1200 West Washington
37 Phoenix, Arizona 85007

38 Ernest Johnson, Director
39 Utilities Division
40 Arizona Corporation Commission
41 1200 West Washington
42 Phoenix, Arizona 85007

1 Scott S. Wakefield, Esq.
Residential Utility Consumer Office
2 1100 West Washington, Suite 220
Phoenix, Arizona 85007
3 Attorney for Intervenor

4 Timothy M. Hogan, Esq.
Arizona Center for Law in the Public Interest
5 202 East McDowell Road, Ste. 153
Phoenix, Arizona 85004
6 Attorney for Intervenor

7 S. David Childers, Esq.
Low & Childers, P.C.
8 2999 North 44th Street, Suite 250
Phoenix, Arizona 85018-7247
9 Attorney for Intervenor ACPA

10 Greg Patterson
Arizona Competitive Power Alliance
11 916 West Adams, Suite 3
Phoenix, Arizona 85007
12 Executive Director for Intervenor ACPA

13 C. Webb Crockett, Esq.
Fennemore Craig, P.C.
14 3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012
15 Attorney for Intervenor AECC, ASARCO & Phelps Dodge

16 Thomas L. Mumaw, Esq.
Pinnacle West Capital Corp.
17 P.O. Box 53999
MS 8695
18 Phoenix, Arizona 85072-3999
Co-counsel for Intervenor APS

19 Deborah A. Scott, Esq.
20 Snell & Wilmer L.L.P.
400 East Van Buren
21 Phoenix, Arizona 85004-2202
Co-counsel for Intervenor APS

22 Barbara A. Klemstine
23 Arizona Public Service
P.O. Box 53999
24 MS 9708
Phoenix, Arizona 85072-3999
25 Representative for Intervenor APS

26
27
28

1 Michael M. Grant, Esq.
Gallagher & Kennedy, P.A.
2 2575 East Camelback Road
Phoenix, Arizona 85016-9225
3 Attorneys for Intervenor for AUIA

4 Gary M. Yaquinto
Arizona Utility Investors Association
5 2100 North Central Avenue, Suite 210
Phoenix, Arizona 85004
6 Representative for Intervenor

7 Billy L. Burtnett, P.E.
3351 North Riverbend Circle East
8 Tucson, Arizona 8570-2509
Intervenor-Applicant

9 Michael L. Kurtz, Esq.
10 Boehm, Kurtz & Lowry
36 East 7th Street, Ste. 1510
11 Cincinnati, Ohio 45202
Co-counsel for Intervenor Kroger

12 William P. Sullivan, Esq.
13 Curtis, Goodwin, Sullivan, Udall & Schwab, P.L.C.
501 East Thomas Road
14 Phoenix, Arizona 85012-3205
Co-counsel for Intervenor Kroger

15 John E. O'Hare
16 3865 North Tucson Boulevard
Tucson, Arizona 95716
17 Intervenor

18 Dan Neidlinger
Neidlinger & Associates
19 3020 North 17th Drive
Phoenix, Arizona 85015

20 Lawrence V. Robertson, Jr., Esq.
21 P.O. Box 1448
Tubac, Arizona 85646
22 Attorney for Intervenors SER, et al.

23 Jeff Schlegel
SWEEP
24 1167 West Samalayuca Drive
Tucson, Arizona 85704-3224
25 Intervenor

26 / / /
27 / / /

1 Peter Q. Nyce, Jr., Esq.
2 Regulatory Law Office
3 Office of the Judge Advocate General
4 Department of the Army, Litigation Center
5 JALS-RL, Ste. 713
6 901 North Stuart Street
7 Arlington, Virginia 22203-1837
8 Attorney for Intervenor

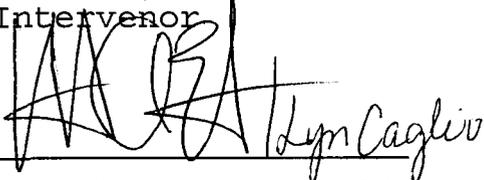
9 Daniel D. Haws II, Esq.
10 OSJA
11 Attn: SJA ATTIN ATZS-JAD
12 Fort Huachuca, Arizona 85613-6000
13 Attorney for Intervenor

14 Christopher Hitchcock, Esq.
15 1 Copper Queen Plaza
16 P.O. Box AT
17 Bisbee, Arizona 85603-0115
18 Attorney for Intervenor SSVEC

19 Eric C. Guidry, Esq.
20 Western Resource Advocates
21 2260 Baseline Road, Suite 200
22 Boulder, Colorado 80302
23 Attorney for Intervenor

24 David Berry
25 Western Resource Advocates
26 P.O. Box 1064
27 Scottsdale, Arizona 85252-1064
28 Intervenor

Cynthia Zwick
1940 East Luke Avenue
Phoenix, Arizona 85016
Intervenor


Lynn Caglio

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