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September 15, 2000

Ms. Deborah Scott
Arizona Corporation Commission
Utilities Division Director
1200 W. Washington Street
Phoenix, Arizona 85007

Re: ACC Process Standardization Working Group – Request for Variation/Exemption of Certain Requirements of A.A.C. R14-2-1612, Docket No. E-00000A-00-0403

Dear Ms. Scott:

On September 14, 2000 members of the Process Standardization Working Group (PSWG) that are under the jurisdiction of the ACC filed with your office a request for a variation/exemption from the provisions of A.A.C. R14-2-1612-K12 pertaining to the recognition of the North American Electric Reliability Council's holidays in calculating "working days" for meter data timeliness requirements. The PSWG is requesting that A.A.C. R14-2-1612-K12 be modified such that holidays be recognized on the days that they are observed. SRP, an ACC non-jurisdictional member of the PSWG, participated in the discussions leading up to the PSWG's recommendation and fully supports the requested rule variation/exemption. SRP is prepared to implement this change in its Direct Access processes and systems once the ACC approves this request for the utilities and parties under the ACC's jurisdiction in order to allow for statewide implementation.

If you have any questions, please direct them to Larry Nuszloch at (602) 236-3214.

Sincerely,

Michael W. Lowe
Manager, Customer Services - Power

cc: Members of PSWG (via email)