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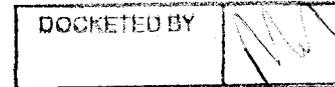
May 4, 2009

Arizona Corporation Commission
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MAY -4 2009

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Docket Control
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007



Re: *AEPCO's Revised Proposal in Relation to the Filing Date for Its 2009 Rate Case Filing; Docket Nos. E-01773A-04-0528 and E-04100A-04-0527*

Dear Sir or Madam:

Having reviewed Staff's April 27 letter, AEPCO requests that the Commission authorize an October 1, 2009 filing date for its rate case on condition that the filing be based upon a 12-month test year ending March 31, 2009 (the "Revised Proposal"). AEPCO believes this test year/filing request is acceptable to Staff, but has not been able to confirm that with the Director of the Utilities Division.

The Revised Proposal addresses Staff's "stale" test year concerns, because the filing date remains only six months after the close of the test period. It also allows AEPCO adequate time to close books, prepare and make the filing, which an only three-month separation between end of test year and filing date does not do. Finally, the Revised Proposal gives AEPCO and its member distribution cooperatives additional time to work on the rate design/cost allocation issues described in AEPCO's original request, which hopefully will lead to more efficient rate case processing for the parties, Staff, Administrative Law Judge and Commission.

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AEPCO requests that the Commission authorize the Revised Proposal at its May Open Meeting.

Very truly yours,

GALLAGHER & KENNEDY, P.A.



By:

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10421-59/2094650

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Control this 4th day of May, 2009.