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ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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June 24, 2009

Mr. Michael M. Grant
Mr. Mark Deartherage
Gallagher & Kennedy, P. A.
Suite 1100
2575 East Camelback Road
Phoenix, Arizona 85016-9225

Mr. Jeffery C. Zimmerman
Moyes, Sellers & Sims
1850 North Central Avenue
Suite 1100
Phoenix, Arizona 85004

RE: IN THE MATTER OF THE APPLICATION OF GRAHAM COUNTY ELECTRIC COOPERTAIVE, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY AND TO TRANSFER CERTAIN OF ITS ASSETS TO THE CITY OF SAFFORD. DOCKET NO. E-01749A-09-0185.

SUFFICIENCY LETTER

Dear Messrs. Grant and Zimmerman:

This letter is to inform you that Graham County Electric Cooperative, Inc.'s application for Commission authority to amend its Certificate of Convenience and Necessity ("CC&N") and to transfer certain of its assets to the City of Safford, has met sufficiency requirements.

If you have any questions concerning this matter, please do not hesitate to contact me at 602-542-0857.

Sincerely,

A handwritten signature in black ink, appearing to read "Ihade Igwe".

Alexander Ihade Igwe, CPA
Executive Consultant III

Arizona Corporation Commission
DOCKETED

DOCKETED BY Handwritten initials in a box.

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Graham County Electric Cooperative, Inc. (Docket No. E-01748A-09-0185)

Sufficiency Letter

June 24, 2009

Mr. Michael M. Grant
Mr. Mark Deartherage
Gallagher & Kennedy, P. A.
2575 East Camelback Road
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(Attorney for Graham County Electric Cooperative, Inc.)

Mr. Jeffery C. Zimmerman
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Suite 1100
Phoenix, Arizona 85004
(Attorney for City of Safford)

cc: Docket Control
Del Smith
Lyn Farmer
Brian Bozzo
Connie Walczak