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1 ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

2 COMMISSIONERS

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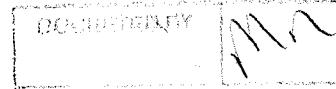
Arizona Corporation Commission

DOCKETED

3 KRISTIN K. MAYES, Chairman 2009 OCT -8 P 2:54
4 GARY PIERCE
5 PAUL NEWMAN
6 SANDRA D. KENNEDY
7 BOB STUMP

AZ CORP COMMISSION
DOCKET CONTROL

OCT - 8 2009



7 IN THE MATTER OF THE APPLICATION OF
8 ARIZONA PUBLIC SERVICE FOR A
9 HEARING TO DETERMINE THE FAIR
10 VALUE OF THE UTILITY PROPERTY OF
11 THE COMPANY FOR RULEMAKING
12 PURPOSES, TO FIX A JUST AND
13 REASONABLE RATE OF RETURN
14 THEREON, TO APPROVE RATE
15 SCHEDULES DESIGNED TO DEVELOP
16 SUCH RETURN.

DOCKET NO. E-01345A-08-0172

**STAFF'S MOTION TO EXTEND THE
TIME TO FILE ITS INITIAL BRIEF AND
FOR AN EXTENSION OF THE DEADLINE
FOR REPLY BRIEFS**

13 On September 21, 2009, the last day of the hearing on this matter, the deadline for parties'
14 initial briefs was set at October 9, 2009, and the deadline for optional reply briefs was set at October
15 16, 2009. Commission Staff respectfully requests a limited extension of time of one week to file its
16 initial brief, or until October 16, 2009. Staff also respectfully requests an additional week for all
17 parties to file their reply briefs (which are optional), or until October 23, 2009.

18 Staff requests the additional time to file its initial brief because since the hearing on this case
19 ended, Staff's workload has been immense. Staff has also had to most recently divert attention to
20 unexpected matters related to the Commission's budget.

21 Because Staff realizes that these expedited timeframes were set with an expectation of
22 ensuring that the matter would be placed on Open Meeting in early December, 2009, Staff is hopeful
23 that the limited additional one week overall for briefing will not result in any delay to the current
24 schedule on this matter.¹ Although Staff is making the request with respect to the initial brief on its

27 ¹ Staff initially agreed to the expedited briefing schedule to accommodate the Signatories' (including APS) desire to have
28 the matter decided so that if the Settlement Agreement is approved, APS' new rates could go into effect in January ,
2010.

1 behalf only, if another party desired the additional time for its initial brief as well, Staff would not
2 oppose that request.

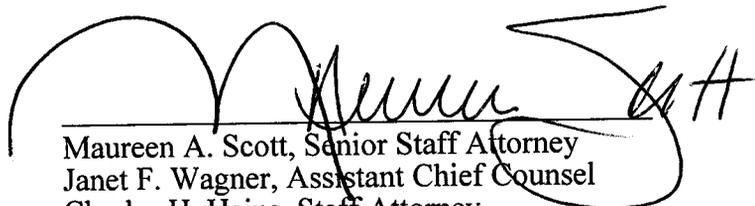
3 Staff, by this Motion, is also requesting that the deadline for filing reply briefs for all parties
4 be extended from October 16, 2009 until October 23, 2009. Because the Solar City hearing is
5 scheduled for October 14 -16, and many of the same parties are involved in that proceeding, Staff
6 believes that all parties would benefit from a one week extension of the reply brief deadline. It would
7 simply be impossible for Staff and other similarly situated parties to prepare for and effectively
8 participate in the Solar City hearing while at the same time review all parties' initial briefs in this
9 matter and prepare a reply brief if necessary.

10 Staff has spoken to APS counsel regarding this matter. While APS does not object to Staff's
11 request, they did reiterate the importance to the Company of this matter remaining on the December
12 Open Meeting agenda. For that reason they indicated that they still intend to file their initial brief on
13 Friday, October 9, 2009, and are hopeful that other parties that are able will as well.

14 WHEREFORE, Staff respectfully requests an extension of time to file its initial brief of one
15 week until Friday, October 16, 2009. Staff also respectfully requests an extension of the deadline for
16 optional reply briefs of one week as well, until Friday, October 23, 2009, because of the conflict with
17 the Solar City hearing now scheduled for October 14-16, 2009.

18 RESPECTFULLY SUBMITTED this 8th day of October, 2009.

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Maureen A. Scott, Senior Staff Attorney
Janet F. Wagner, Assistant Chief Counsel
Charles H. Hains, Staff Attorney
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
602) 542-3402

1 Original and thirteen (13) copies
2 of the foregoing were filed this
3 8th day of October, 2009 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85008

6 Copies of the foregoing emailed/mailed this
7 8th day of October, 2009 to:

7 Thomas L. Mumaw
8 Meghan H. Grabel
9 PINNACLE WEST CAPITAL CORPORATION
10 LAW DEPARTMENT
11 P.O. Box 53999
12 Phoenix, Arizona 85072-3999

10 William J. Maledon
11 OSBORN MALEDON P.A.
12 2929 North Central Avenue
13 Phoenix, Arizona 85067-6379

13 Robert Metli
14 SNELL & WILMER L.L.P.
15 400 East Van Buren Street
16 Phoenix, Arizona 85004-2202

15 Barbara Klemstine
16 Zachary Fryer
17 Susan Casady
18 ARIZONA PUBLIC SERVICE COMPANY
19 P.O. Box 53999
20 Mail Station 9708
21 Phoenix, Arizona 85072-3999

19 Michael L. Kurtz
20 Kurt J. Boehm
21 BOEHM, KURTZ & LOWRY
22 36 East Seventh Street, Suite 1510
23 Cincinnati, Ohio 45202

22 C. Webb Crockett
23 Patrick J. Black
24 FENNEMORE CRAIG P.C.
25 3003 North Central Avenue, Suite 2600
26 Phoenix, Arizona 85012-2913

Lawrence V. Robertson, Jr.
Attorney at Law
P.O. Box 1448
Tubac, Arizona 85646

Michael A. Curtis
William P. Sullivan
Larry K. Udall
CURTIS, GOODWIN, SULLIVAN,
UDALL & SCHWAB, P.L.C.
501 East Thomas Road
Phoenix, Arizona 85012-3205

Timothy M. Hogan
ARIZONA CENTER FOR LAW IN
THE PUBLIC INTEREST
202 East McDowell Road, Suite 153
Phoenix, Arizona 85004

Daniel W. Pozefsky
RUCO
1110 West Washington Street, Suite 220
Phoenix, Arizona 85007

Michael M. Grant
GALLAGHER & KENNEDY
2575 East Camelback Road
Phoenix, Arizona 85016-9225

Gary Yaquinto
ARIZONA INVESTMENT COUNCIL
2100 North Central Avenue, Suite 210
Phoenix, Arizona 85004

Jay I. Moyes
MOYES SELLERS & SIMS
1850 North Central Avenue, Suite 1100
Phoenix, Arizona 85004-0001

David Berry
WESTERN RESOURCE ADVOCATES
P.O. Box 1064
Scottsdale, Arizona 85252

- 1 Jeff Schlegel
SWEEP Arizona Representative
- 2 1167 West Samalayuca Drive
Tucson, Arizona 85704
- 3
- 4 Jeffrey J. Woner
K.R. SALINE & ASSOC., PLC
160 North Pasadena, Suite 101
- 5 Mesa, Arizona 85201
- 6 Scott Canty, General Counsel
THE HOPI TRIBE
- 7 P.O. Box 123
Kykotsmovi, Arizona 86039
- 8
- 9 Cynthia Zwick
1940 East Luke Avenue
Phoenix, Arizona 85016
- 10
- 11 Nicholas J. Enoch
LUBIN & ENOCH, P.C.
349 North 4th Avenue
- 12 Phoenix, Arizona 85003
- 13 Carlo Dal Monte
65 Front Street, Suite 201
- 14 Nanaimo, British Columbia V9R 5H9
- 15 Barbara Wyllie-Pecora
27458 N. 128th Dr.
- 16 Peoria, Arizona 85383
- 17 Amanda Ormond
7650 S. McClintock
Suite 103-282
- 18 Tempe, Arizona 85284
- 19
- 20 Douglas Fant
3655 W. Anthem Way
-A-109 PMB 411
- 21 Anthem, Arizona 85086
- 22 Lieutenant Colonel Karen White
AFLSA/JACL-ULT
- 23 139 Barnes Dr., Suite 1
Tyndall AFB, Florida 32403-5319
- 24
- 25 John Moore, Jr.
7321 North 16th Street
Phoenix, Arizona 85020
- 26
- 27 Steve Morrison
SCA TISSUE NORTH AMERICA
14005 West Old Highway 66
- 28 Bellemont, Arizona 86015

Kevin Higgins
ENERGY STRATEGIES, LLC
215 South State Street, Suite 200
Salt Lake City, Utah 84111

