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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

DOCKETED

SEP 25 2002

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2002 SEP 25 P 4: 25

AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY FOR
APPROVAL OF NEW PARTIAL REQUIRE-
MENTS SERVICE TARIFFS; MODIFICATION OF
EXISTING PARTIAL REQUIREMENTS
SERVICE TARIFF 101; AND ELIMINATION OF
QUALIFYING FACILITY TARIFFS.

Docket No. E-01933A-02-0345

E-01933A-98-0471

**SURREPLY TO SOUTHWESTERN
POWER GROUP/BOWIE POWER
STATION'S RESPONSE TO
OPPOSITION**

The response filed by Southwestern Power Group ("SWPG") and Bowie Power Station ("Bowie") confirms the grounds underlying TEP's opposition to intervention by SWPG/Bowie: That intervention by SWPG/Bowie will unduly expand the scope of the issues of the docket. SWPG/Bowie clearly state that they want the Commission to:

- (i) address whether TEP can sell power to a Qualifying Facility located outside TEP's service area and within an electric cooperative's service area that is not open to competition [at 1:27 to 2:6]; and
- (ii) investigate whether TEP's corporate policy is to question whether PURPA's "QF" purchase requirements have a role in a competitive wholesale generation market [at 2:14-20].

Both of these positions raise broad policy considerations that go well beyond the discrete tariff issues in this docket.¹ SWPG/Bowie's interests are better addressed in a broader context. Consideration of those interests here would unduly broaden the issues in this docket and intervention by SWPG/Bowie should be denied.

¹ SWPG/Bowie acknowledge [at 3:1-3] that they do not envision sales of power to TEP under the PRS-101 tariff.

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RESPECTFULLY SUBMITTED this 25th day of September, 2002.

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