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BEFORE THE ARIZONA CORPORATION COMMISSION  
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Arizona Corporation Commission  
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MAR - 1 2010

AZ CORP COMMISSION  
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IN THE MATTER OF THE APPLICATION  
OF ARIZONA ELECTRIC POWER  
COOPERATIVE, INC. FOR HEARING TO  
DETERMINE THE FAIR VALUE OF ITS  
PROPERTY FOR RATEMAKING  
PURPOSES, TO FIX A JUST AND  
REASONABLE RETURN THEREON AND  
TO APPROVE RATES DESIGNED TO  
DEVELOP SUCH RETURN

DOCKET NOS. E-01773A-09-0472

**MOHAVE ELECTRIC  
COOPERATIVE'S REQUEST FOR  
EXPEDITED PROCEDURAL  
CONFERENCE TO DISCUSS  
POTENTIAL CHANGES TO  
PROCEDURAL SCHEDULE**

**(Assigned to The Honorable Jane Rodda)**

Mohave Electric Cooperative, Inc. ("Mohave) by and through its Legal Counsel undersigned, hereinafter respectfully requests a procedural conference be set expeditiously to allow the parties to discuss potential changes to the procedural schedule for this matter, including, without limitation adjusting the filing dates of testimony for the reasons as hereinafter set forth.<sup>1</sup>

**Background:**

Arizona Electric Power Cooperative, Inc. ("AEPSCO") is a Generation Cooperative with All Requirements Members ("ARMs") and Partial Requirements Members ("PRMs"). Since the filing of the above captioned rate application, Trico elected to join

<sup>1</sup> A similar Request for Expedited Procedural Conference is also being filed in Docket No. E-04100A-09-0496 involving Southwest Transmission Cooperative, Inc. to ensure continued coordination of the schedules for the two matters.

1 Sulphur and Mohave as a PRM. Collectively, Trico, Mohave and Sulphur constitute  
2 approximately eighty-five percent (85%) of the load of AEPCO.

3 Over the past several months, AEPCO and its members have been negotiating  
4 amendments to the terms and conditions governing the relationship between AEPCO and its  
5 PRMs and ARMs. Such documents, and the initial Partial Requirements Contract with Trico,  
6 must be submitted to and approved by the Rural Utilities Service ("RUS") and the Commission  
7 before becoming enforceable. It is expected that final documents will have been approved by  
8 AEPCO and all of its members and submitted to RUS in the near future.

9 The rate filing does not reflect Trico as a PRM. Nor does the filing reflect the  
10 terms and conditions under which AEPCO and Transco delivered power and energy to its  
11 Members during the test year (i.e., under the terms and conditions of existing contracts). Nor  
12 does the AEPCO rate filing reflect the terms and conditions presently being finalized by its  
13 members.

14 Mohave, therefore, believes the foregoing changed circumstances will materially  
15 impact the AEPCO rate filing and necessitate significant changes in the direct case presented  
16 by AEPCO and, in turn will, impact the positions of Staff and all intervenors in this matter.  
17 The current Procedural Schedule requires Staff and Intervenors to file direct testimony by April  
18 30, 2010. Mohave requests that a procedural conference be held as soon as possible to discuss  
19 how the changed circumstances may impact the present filings and determine whether changes  
20 should be made to the procedural schedule to allow this matter to proceed in an orderly  
21 fashion.

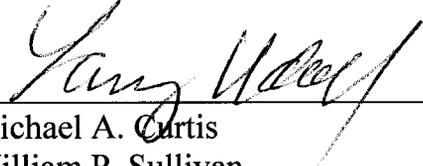
22 Mohave brings the foregoing changed circumstances to the attention of the  
23 Administrative Law Judge and Staff at the earliest possible moment in an effort to minimize  
24 expending resources unnecessarily on the evaluation of the present application and to allow the  
25 parties to come to mutual understanding on how to address these changed circumstances in an

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orderly fashion – such as having AEPCO amend its initial filing to reflect the changed circumstances rather than trying to address the changes piecemeal.

Respectfully submitted this 1<sup>st</sup> day of March, 2010.

CURTIS, GOODWIN, SULLIVAN,  
UDALL & SCHWAB, P.L.C.

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PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 18 day of March, 2010, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

COPIES of the foregoing hand delivered/  
mailed this 18 day of March, 2010 to:

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