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BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION

Arizona Corporation Commission

DOCKETED

Nov 19 9 08 AM '98

JIM IRVIN

Commissioner/Chairman

NOV 19 1998

RENZ D. JENNINGS

Commissioner

DOCUMENT CONTROL

CARL J. KUNASEK

Commissioner

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IN THE MATTER OF THE APPLICATION)
 OF TUCSON ELECTRIC POWER)
 COMPANY FOR APPROVAL OF ITS)
 PLAN FOR STRANDED COST)
 RECOVERY)

DOCKET NO. E-01993A-98-0471

IN THE MATTER OF THE FILING OF)
 TUCSON ELECTRIC POWER COMPANY)
 OF UNBUNDLED TARIFFS PURSUANT)
 TO A.A.C. R14-2-1601 ET SEQ.)

DOCKET NO. E-01993A-97-0772

IN THE MATTER OF COMPETITION IN)
 THE PROVISION OF ELECTRIC)
 SERVICES THROUGHOUT THE STATE)
 OF ARIZONA)

DOCKET NO. RE-00000C-94-0165

IN THE MATTER OF THE APPLICATION)
 OF ARIZONA PUBLIC SERVICE)
 COMPANY FOR APPROVAL OF ITS)
 PLAN FOR STRANDED COST)
 RECOVERY)

DOCKET NO. E-01345A-98-0473

IN THE MATTER OF THE FILING OF)
 ARIZONA PUBLIC SERVICE COMPANY)
 OF UNBUNDLED TARIFFS)
 PURSUANT TO A.A.C. R14-2-1601 ET SEQ.)

DOCKET NO. E-01345A-97-0773

**ARIZONA ELECTRIC POWER COOPERATIVE, INC.'S RESPONSE TO STAFF'S
 REQUEST FOR RECONSIDERATION AND MODIFICATION
 OF PROCEDURAL ORDER**

Arizona Electric Power Cooperative, Inc. ("AEPSCO") opposes the Staff request.

Although the request to move the intervenor filing time from 4:00 p.m. to noon on November 30

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seems minor, because intervenors' response time covers Thanksgiving week, the request actually is more than a 10% reduction in the already small number of work days allotted to review.

As to Staff's new request that a hearing be set December 3 – the day after response testimony is filed – it obviously allows no time for any hearing preparation.

AEPCO has no desire to delay this process unnecessarily. However, the transmission aspects of the settlement are issues of great concern to Arizonans, generally and the rural customers of AEPCO and its distribution cooperatives, specifically. Staff's procedural requests allow neither interested parties nor the Commission adequate time to analyze, comment on and consider the merits of the proposal

RESPECTFULLY SUBMITTED this 19th day of November, 1998.

GALLAGHER & KENNEDY, P.A.

By Michael M. Grant

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Attorneys for Arizona Electric Power
Cooperative, Inc.

Original and ten (10) copies
of the foregoing document filed
this 19th day of November, 1998, with:

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

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Copy of the foregoing document
hand delivered this 19th day of
November, 1998, to:

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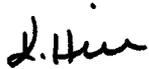
Mr. Ray Williamson
Acting Director, Utilities Division
Arizona Corporation Commission
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Copy of the foregoing document
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19th day of November, 1998, to:

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Chief Hearing Officer
Hearing Division
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All parties in Docket Nos. E-01993A-98-0471,
E-01993A-97-0772, E-01345A-98-0473,
E-01345A-97-0773 and RE-00000C-94-0165,



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