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BEFORE THE ARIZONA CORPORATION COMMISSION

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[Signature]

CARL J. KUNASEK
Commissioner - Chairman
JIM IRVIN
Commissioner
WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF COMPETITION IN THE) DOCKET NO. RE-00000C-94-0165
PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA.)

IN THE MATTER OF THE STRANDED COST) DOCKET NO. E-01787A-98-0465
FILING AND REQUEST FOR A WAIVER OF)
CERTAIN PORTIONS OF THE RULES FILED)
BY MOHAVE ELECTRIC COOPERATIVE, INC.)

IN THE MATTER OF THE FILING BY) DOCKET NO. E-01750A-98-0701⁵⁵
MOHAVE ELECTRIC COOPERATIVE, INC. OF)
UNBUNDLED AND STANDARD OFFER)
SERVICE TARIFFS PURSUANT TO A.A.C. R14-) 2-1606.)

IN THE MATTER OF THE STRANDED COST) DOCKET NO. E-01461A-98-0466
FILING AND REQUEST FOR A WAIVER OF)
CERTAIN PORTIONS OF THE RULES FILED)
BY TRICO ELECTRIC COOPERATIVE, INC.)

IN THE MATTER OF THE FILING BY TRICO) DOCKET NO. E-01461A-97-0696
ELECTRIC COOPERATIVE, INC. OF)
UNBUNDLED AND STANDARD OFFER)
SERVICE TARIFFS PURSUANT TO A.A.C. R14-) 2-1606)

IN THE MATTER OF THE STRANDED COST) DOCKET NO. E-01749A-98-0468
FILING AND REQUEST FOR A WAIVER OF)
CERTAIN PORTIONS OF THE RULES FILED)
BY GRAHAM COUNTY ELECTRIC)
COOPERATIVE, INC.)

...
...
...

1 IN THE MATTER OF THE STRANDED COST) DOCKET NO. E-01703A-98-0469
 2 FILING AND REQUEST FOR A WAIVER OF)
 3 CERTAIN PORTIONS OF THE RULES FILED)
 4 BY DUNCAN VALLEY ELECTRIC)
 COOPERATIVE, INC.)

5 **MOTION TO CONTINUE MOHAVE ELECTRIC COOPERATIVE, INC.'S**
 6 **STRANDED COST HEARING DATE**

7 Mohave Electric Cooperative, Inc., ("Mohave"), by and through counsel undersigned,
 8 respectfully moves the Hearing Division to continue the hearing in the above-captioned matters
 9 from February 7, 2000, to a date after Arizona Electric Power Cooperative, Inc.'s ("AEPCO")
 10 stranded cost proceeding is completed and a final Order regarding AEPCO's stranded cost
 11 methodology is issued by the Commission for the reason that Mohave cannot develop its
 12 stranded cost recovery plan until after AEPCO's stranded cost methodology is known and
 13 determined.
 14

15 **I. BACKGROUND**

16 On November 9, 1999, Mohave filed a Motion to continue the hearing in Docket Nos.
 17 RE-00000C-94-0165, E-01787A-98-0465, and E-01750A-97-0701 on the grounds that
 18 Mohave cannot develop its stranded cost recovery plan until after AEPCO's stranded cost
 19 proceeding is completed. On November 10, 1999, Trico Electric Cooperative, Inc. ("Trico")
 20 filed a Motion to continue the hearing in Docket Nos. RE-00000C-94-0165, E-01461A-98-
 21 0466 and E-01461A-97-0696 on the same grounds. For public interest reasons, in a
 22 November 16, 1999 Procedural Order, the Hearing Officer granted Mohave's and Trico's
 23 Motions to continue the stranded cost hearing until after the Commission makes a
 24 determination regarding AEPCO's stranded cost proceeding. The Hearing Officer also
 25
 26

1 consolidated the stranded cost hearings of all AEPCO's member cooperatives including
2 Mohave, Trico, Graham County, and Duncan Valley. However, subsequent to this Procedural
3 Order, AEPCO's stranded cost hearing was again continued, until February 28, 2000, making
4 the instant Motion to continue necessary.
5

6 II. ARGUMENT

7 MOHAVE'S STRANDED COST PLAN CANNOT BE DETERMINED UNTIL 8 THE OUTCOME OF AEPCO'S STRANDED COST PROCEEDING IS KNOWN.

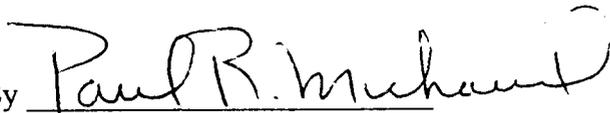
9 Mohave is a non-profit electric distribution cooperative and currently purchases all of
10 its energy requirements under the terms and conditions of an all-requirements power purchase
11 agreement with AEPCO. Furthermore, AEPCO is in the process of a major restructuring
12 which will likely impact the allocation of costs between AEPCO and Mohave. As such, any
13 plan for recovery of stranded costs by Mohave is dependant on the outcome of AEPCO's
14 stranded cost proceeding. The fact that AEPCO's stranded cost proceeding is hotly contested
15 only heightens Mohave's requirement to know the final determination of AEPCO's stranded
16 cost proceeding before Mohave can propose its own stranded cost plan. AEPCO's stranded
17 cost proceeding was originally scheduled to be completed well before the commencement of
18 Mohave's stranded cost proceeding. However, because of AEPCO's latest continuance, its
19 stranded cost proceeding is now delayed until February 28, 2000, twenty-one days after
20 Mohave's stranded cost hearing (consolidated with the other member cooperatives) is currently
21 scheduled to commence. Thus, it is impossible, again, for Mohave to know the outcome of
22 AEPCO's stranded cost proceeding, in order to develop its own stranded cost plan, by
23 Mohave's February 7, 2000 hearing date. Therefore, it is reasonable, and in the public interest,
24
25
26

1 for Mohave's stranded cost hearing to be continued to a date after AEPCO's stranded cost
2 proceeding is completed and a final Order regarding AEPCO's stranded cost methodology is
3 issued by the Commission.
4

5 WHEREFORE, although Mohave cannot speak for the other member Cooperatives
6 consolidated in this proceeding, Mohave respectfully requests that Mohave's stranded cost
7 hearing be continued from February 7, 2000, to a date after AEPCO's stranded cost
8 proceeding is completed and a final Order regarding AEPCO's stranded cost methodology is
9 issued by the Commission.
10

11 RESPECTFULLY SUBMITTED, this 11th day of January, 2000.

12 MARTINEZ & CURTIS, P.C.

13 By 

14 Michael A. Curtis, Esq.
15 Paul R. Michaud, Esq.
16 2712 North Seventh Street
17 Phoenix, Arizona 85006-1090
18 Attorneys for Mohave Electric
19 Cooperative, Inc.
20
21

22 **The original and ten (10) copies of**
23 **the foregoing are filed this 11th day**
24 **of January, 2000 with:**

25 DOCKET CONTROL
26 Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

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**A copy of the foregoing is mailed
this 11th day of January, 2000 to:**

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