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BEFORE THE ARIZONA CORPORATION COMMISSION V C U

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

Arizona Corporation Commission

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AZ CORP COMMISSION
DOCUMENT CONTROL

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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.C.C R14-1-1601
ET SEQ.

} Docket No. E-01345A-97-0773
}
}

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

} Docket No. RE-00000C-94-0165
}
}

**STATEMENT OF ENRON CORP.
ON HEARING OFFICER EXHIBIT**

At the hearing held in the above-captioned matter on July 21, 1999, Hearing Officer Rudibaugh provided the parties with a copy of Hearing Examiner Exhibit 1, which lists APS Standard Offer Service Charges, APS Noncompetitive Charges, and Regulatory Charges and Taxes. Parties were instructed to assume APS's cost allocation methodology and to comment on whether the breakdown of charges in the Exhibit were correct for both short and long term purposes. Enron concurs with the breakdown of charges contained in the Hearing Examiner's Exhibit.

Enron continues to advocate unbundling of both Standard Offer and Direct Access bills. This informational unbundling is critical to retail choice as it allows

consumers to compare prices intelligently. Under the billing proposals APS has put forward, the Direct Access portion of the informational unbundling contains more than twice the number of line items that the Standard Offer service contains, which is surprisingly counter-intuitive since APS provides more services for the Standard Offer customers. This loading up of items on the competitive side and simplification of services on the Standard Offer side would frighten off even the most avid shopper.

The bottom line is simply this: to the extent APS provides the same services for both Standard Offer and Direct Access customers, those services and their applicable rates should appear on the bill in the same format. To allow APS to portray Standard Offer service in a different, and more simplistic way, gives Standard Offer service a competitive advantage. Under the August 3rd draft circulated by APS, there is no easy way to even compare total bills, which is what the consumer in the end must be able to do in order to make the best choice.

Attached to this filing is a sample bill which Enron believes accomplishes the job of educating consumers in a meaningful way and we would request that the Hearing Examiner adopt this format as the unbundled bill format for APS.

Dated: August 9, 1999

Respectfully submitted,

ENRON CORP.

By: 
Leslie J. Lawner, Esq.
Director, Government Affairs
712 North Lea
Roswell, NM 88201
(505) 623-6778
llawner@enron.com

THE ORIGINAL AND 18 COPIES OF THE FOREGOING DOCUMENT WERE SENT BY
OVERNIGHT MAIL ON AUGUST 9, 1999 TO

Docket Control
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, Arizona 85007

A COPY OF THE FOREGOING DOCUMENT WAS SENT BY FIRST CLASS MAIL ON AUGUST 9TH,
1999 TO:

Jerry L. Rudibaugh, Chief Hearing Officer
Hearing Division
Arizona Corporation Commission
1200 West Washington St.
Phoenix, AZ 85007

Walter W. Meek
Arizona Utility Investors Assn
2100 North Central Ave., Ste 210
Phoenix, AZ 85004

Paul Bullis, Chief Counsel
Christopher C. Kempley, Esq.
Legal Division
Arizona Corporation Commission
1200 West Washington St.
Phoenix, AZ 85007

Lex J. Smith, Esq.
Michael Patten
2901 North Central Ave.
PO Box 400
Phoenix, AZ 85001-0400

Ray Williamson, Acting Director
Utilities Division
Arizona Corporation Commission
1200 West Washington St.
Phoenix, AZ 85007

Randall H. Warner
Roshka Heyman & Dewulf
400 North Fifth St., Ste 1000
Phoenix, AZ 85004-3901

Larry V. Robertson, Esq.
Munger Chadwick
333 North Wilmot St., Ste 300
Tucson, AZ 85711

Timothy M. Hogan, Esq.
Arizona Ctr for Law in the Public Interest
202 E. McDowell Rd., Ste 153
Phoenix, AZ 85004

Jay Shapiro, Esq.
Webb Crockett, Esq.
Fennemore Craig
3003 North Central Ave., Ste 2600
Phoenix, AZ 85012

Steven M. Wheeler, Esq.
Thomas L. Mumaw, Esq.
Jeffrey B. Guldner, Esq.
Snell & Wilmer LLP
One Arizona Center
Phoenix, AZ 85004

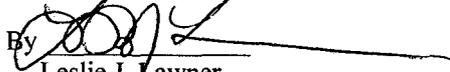
Douglas C. Nelson, Esq.
7000 North 16th St., Ste 120-307
Phoenix, AZ 85020

Robert S. Lynch, Esq.
340 East Palm Lane, Ste. 140
Phoenix AZ 85004

Greg Patterson
Scott Wakefield, Esq.
RUCO
2828 N. Central Ave. Ste 1200
Phoenix, AZ 85004

Janet Regner
Betty Pruitt
Arizona Community Action Assoc.
2627 N. 3rd St., Ste. 2
Phoenix, AZ 85004

H. Ward Camp, General Manager
PHASER Advanced Metering Services
400 Gold, SW, Ste 1200
Albuquerque, NM 87102

By 
Leslie J. Lawner,
Director, Government Affairs
Enron Corp.

ARIZONA PUBLIC SERVICE COMPANY
Standard Offer Bill With Informational Unbundling

Customer: xxx
Service Address: xxx
Account Number: xxx

Meter Reading Date: xxx
Rates effective: 7/1/99
Rate Schedule: E-12

Your total kilowatthour usage is 991
Your total bill is \$116.67 or 11.77 cents per kilowatthour

Your total bill of \$116.67 is for the following services:

PART 1

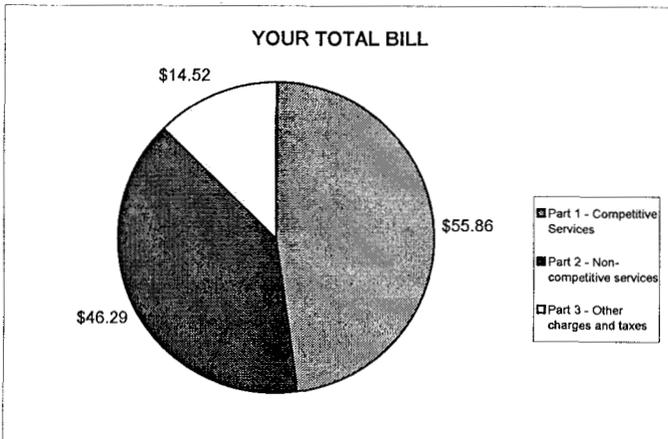
Generation	x	
Ancillary Services associated with Generation	x	<i>These services are provided by APS as a "Standard Offer" but are also available from competitive energy service providers</i>
Metering	x	
Meter Reading	x	
Billing	x	
Total for competitive services		\$55.86 or 5.64 cents per kilowatthour

PART 2

Distribution Service and related Ancillary Services	x	<i>These services are provided by APS regardless of your choice of energy service provider</i>
Transmission and related Ancillary Services	x	
Total for non-competitive services		\$46.29 or 4.67 cents per kilowatthour

PART 3

System Benefits Charges	\$1.14	<i>These charges apply regardless of your choice of energy service provider</i>
Competition Transition Charges	\$9.22	
Regulatory Assessment	\$0.12	
Sales Tax	\$4.04	
Total for other charges and taxes		\$14.52 or 1.47 cents per kilowatthour



See page 2 for a better understanding of each of the services and charges referred to above