



# CITY OF TUCSON

The Sunshine City

CITY HALL  
P.O. BOX 27210  
TUCSON, ARIZONA 85726-7210



0000121186

RECEIVED  
AZ CORP COMMISSION  
OFFICE OF  
THE  
CITY ATTORNEY  
(520) 791-4221

JUL 6 1 36 PM '98

DOCUMENT CONTROL

July 2, 1998

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

Re: Docket No. U-0000-94-165

Enclosed for filing, please find the original and 10 copies of the City of Tucson's Notice of Filing and Comments on Staff's 1<sup>st</sup> Draft of Proposed Revisions of the Retail Electric Competition Rules (R-14-2-1601, et al.)

Sincerely,

Loretta Humphrey  
Principal Assistant City Attorney

LH:lr

Enclosures

\\1work\lr\doCKET.doc

Arizona Corporation Commission  
DOCKETED

JUL 06 1998

DOCKETED BY

Office of the City Attorney  
P.O. Box 27210  
Tucson, Arizona 85726-7210

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

RECEIVED  
AZ CORP COMMISSION

JUL 06 6 1 36 PM '98

**BEFORE THE ARIZONA CORPORATION COMMISSION**

DOCKET CONTROL

**JIM IRVIN**  
Commissioner – Chairman

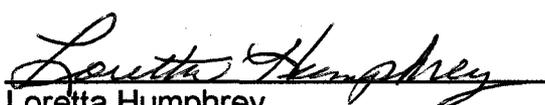
**RENZ JENNINGS**  
Commissioner

**CARL J. KUNASEK,**  
Commissioner

IN THE MATTER OF THE COMPLETION IN ) DOCKET NO. U-0000-94-165  
THE PROVISION OF ELECTRIC SERVICES )  
THROUGHOUT THE STATE OF ARIZONA ) **NOTICE OF FILING**  
)

City of Tucson hereby provides Notice of Filing Comments on Staff's First Draft of Proposed Revisions of the Retail Electric Competition Rules (R14-2-1681, *et al.*). The City expects to make additional comments on a Second Draft and at the public hearing before the Commission.

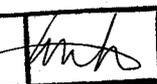
DATED this 2<sup>nd</sup> day of July, 1998.

  
Loretta Humphrey  
Principal Assistant City Attorney  
City of Tucson – City Attorney's Office  
P.O. Box 27210  
Tucson, AZ 85726-7210

i:\work\lrderegnot.doc

Arizona Corporation Commission  
**DOCKETED**

**JUL 06 1998**

DOCKETED BY 

47

RECEIVED  
AZ CORP COMMISSION  
Jul 6 1 36 PM '98

BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN  
Commissioner – Chairman

Arizona Corporation Commission  
DOCKETED

RENZ JENNINGS  
Commissioner

JUL 06 1998

CARL J. KUNASEK,  
Commissioner

DOCKETED BY *[Signature]*

IN THE MATTER OF THE COMPLETION IN ) DOCKET NO. U-0000-94-165  
THE PROVISION OF ELECTRIC SERVICES )  
THROUGHOUT THE STATE OF ARIZONA ) **COMMENTS ON STAFF'S**  
 ) **1<sup>ST</sup> DRAFT OF PROPOSED**  
 ) **REVISIONS OF THE RETAIL**  
 ) **ELECTRIC COMPETITION**  
 ) **RULES (R-14-2-1601, et al.)**

City of Tucson offers the following suggestions and recommendations:

**R14-2-1601. Definitions.**

The City of Tucson suggests that the term "customer" be defined and added to this section.

\*\*\*

12. "Electric Service Provider" (ESP) means a company supplying, marketing, or brokering at retail any of the services described in R14-2-1605 of R14-2-1606.

\*\*\*

**R14-2-1604. Competitive Phases.**

The City of Tucson recommends the following changes.

A. All Affected Utility customers with peak demand load of 1MW or greater, or a self-aggregated load of 1MW or greater will be eligible for competitive electric services no later than January 1, 1999.

Office of the City Attorney  
P.O. Box 27210  
Tucson, Arizona 85726-7210

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

1 B. Groups of Affected Utility customers with individual peak load demands of  
2 40 kW or greater aggregated into a combined load of 1 MW or greater will  
3 be eligible for competitive electric services no later than January 1, 1999. If  
4 peak load data are not available, the 40 kW criterion can be determined to  
5 be met if the customer's usage exceeded 16,500 kWh in any month within  
6 the last twelve consecutive months. From January 1, 1999, through  
7 December 31, 2000, aggregation of new competitive customers will be  
8 allowed until such time as 20% 50% of the Affected Utility's 1995 system  
9 peak demand is served by competitors. At that point all additional  
10 aggregated customers must wait until January 1, 2001, to obtain  
11 competitive service.

12 NOTE: Tucson does not support artificial barriers to aggregation of  
13 customer groups and believes the minimum 40 kW requirement for bundling  
14 electric customers into an aggregated load must be removed.

15 \* \* \*

16 C.

17 \* \* \*

18 3. Load profiling may be used; however, residential customers participating in  
19 the residential phase-in program may choose other metering measurement  
20 options offered by their electric service provider consistent with the  
21 Commission's rules on metering.

22 \* \* \*

23 D. Each Affected Utility shall file a report detailing possible mechanisms to  
24 provide benefits, such as rate reductions of 3% - 5%, to all customers  
25 determined not to be eligible for competitive electric services directly or  
26 through aggregation in a manner consistent with R14-2-1604 (B). **not  
purchasing competitive electric services. The reduction shall be in  
effect from January 1, 1999, through December 31, 2000.**

\* \* \*

**R14-2-1606. Services Required To Be Made Available by Affected Utilities.**

The City of Tucson recommends the following changes.

\* \* \*

23 F. After January 1, 2001, power purchased by a Utility Distribution Company  
24 to serve standard offer customers shall be acquired through competitive bid  
25 **with award to the low bidder meeting specifications.** Any resulting  
26 long-term contract shall contain provisions allowing the UDC to ratchet  
down its power purchases. If the cost of such a ratchet provision is  
unreasonable, the affected UDC may file for an exemption from this rule.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

\*\*\*

**R14-2-1607. Recovery of Stranded Cost of Affected Utilities.**

The City of Tucson recommends the following changes.

\*\*\*

- C. The Affected Utilities shall file **public** estimates of unmitigated Stranded Cost. Such estimates shall be fully supported by analyses and by records of market transactions undertaken by willing buyers and willing sellers.

\*\*\*

- E. The Commission shall, after **public** hearing and consideration of analyses and recommendations presented by the Affected Utilities, Staff, and intervenors, determine for each Affected Utility the magnitude of Stranded Cost, and appropriate Stranded Cost recovery mechanisms and charges. In making its determination of mechanisms and charges, the Commission shall consider at least the following factors:

\*\*\*

**R14-2-1613. Service Quality, Consumer Protection, Safety, and Billing Requirements.**

The City of Tucson recommends the following changes.

\*\*\*

- I.
  - 7. Minimum metering requirements for competitive customers over 20 kW, or 100,000 kWh annually, should consist of hourly consumption measurement meters or meter systems. **Predictable loads, such as street lights, will be permitted to use load profiling to satisfy the requirements for hourly consumption data. The Affected Utility or Electric Service Provider will make the determination if a load is predictable.**
  - 8. Competitive customers with hourly loads of 20kW (or 100,000 kWh annually) **50kW** or less, will be permitted to use load profiling to satisfy the requirements for hourly consumption data.

NOTE: This is a compromise suggestion, in view of the fact that this threshold has never been sufficiently analyzed to determine if it is best for Arizona. At the Metering & Meter Reading Committee of the ACC Unbundled Services and Standard Offer Working Group meeting of May 18, 1998, there were two load profile presentations, one by SRP and one by XENERGY; conclusions were that load profiling is relatively accurate, and that benefit-to-cost ratios for interval metering are very low, especially for

Office of the City Attorney  
P.O. Box 27210  
Tucson, Arizona 85726-7210

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

lower thresholds. Analysis is needed before mandating a threshold of this sort.

9. Meter ownership will be limited to the Affected Utility, the Electric Service Provider, or their representative, or the customer ~~who will obtain the meter from the Affected Utility or Electric Service Provider.~~

DATED this 2 day of July, 1998

THOMAS J. BERNING  
City Attorney

  
Loretta Humphrey  
Principal Assistant City Attorney  
Office of the City Attorney  
P.O. Box 27210  
Tucson, AZ 85726-7210

**AN ORIGINAL AND TEN COPIES  
of the foregoing City of Tucson's  
Post-Hearing Memorandum filed  
this 2nd day of July, 1998, to:**

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

i:\work\lrderegcom.doc

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Copy of the foregoing mailed  
this 2<sup>nd</sup> day of July, 1998 to:

Barbara Klemstine  
ARIZONA PUBLIC SERVICE CO.  
Law Department, Station 9909  
P.O. Box 53999  
Phoenix, Arizona 85072-3999

Greg Patterson  
RUCO  
2828 N Central Ave, Suite 1200  
Phoenix, Arizona 85004

Michael A. Curtis  
MARTINEZ & CURTIS, P.C.  
2712 North 7th Street  
Phoenix, Arizona 85006  
Attorneys for Arizona Municipal Power Users' Association

Walter W. Meek, President  
ARIZONA UTILITY INVESTORS ASSOCIATION  
2100 N. Central Avenue, Suite 210  
Phoenix, Arizona 85004

Rick Gilliam  
LAND AND WATER FUND OF THE ROCKIES  
2260 Baseline Road, Suite 200  
Boulder, Colorado 80302

Charles R. Huggins  
ARIZONA STATE AFL-CIO  
110 North 5th Avenue  
P.O. Box 13488  
Phoenix, Arizona 85002

David C. Kennedy  
LAW OFFICES OF DAVID C. KENNEDY

100 West Clarendon Avenue, Suite 200  
Phoenix, Arizona 85012-3525

Norman J. Furuta  
DEPARTMENT OF THE NAVY  
900 Commodore Drive, Building 107  
P.O. Box 272 (Attn. Code 90C)  
San Bruno, California 94066-0720

Thomas C. Horne  
Michael S. Dulberg  
HORNE, KAPLAN & BISTROW, P.C.  
40 North Central Avenue, Suite 2800  
Phoenix, Arizona 85004

Barbara S. Bush  
COALITION FOR RESPONSIBLE ENERGY EDUCATION  
315 West Riviera Drive  
Tempe, Arizona 85252

Rick Lavis  
ARIZONA COTTON GROWERS ASSOCIATION  
4139 East Broadway Road  
Phoenix, Arizona 85040

Steve Brittle  
DON'T WASTE ARIZONA, INC.  
6205 South 12th Street  
Phoenix, Arizona 85040

Office of the City Attorney  
P.O. Box 27210  
Tucson, Arizona 85726-7210

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Karen Glennon  
19037 N. 44th Avenue  
Glendale, Arizona 85308

AJO IMPROVEMENT COMPANY  
P.O. Drawer 9  
Ajo, Arizona 85321

COLUMBUS ELECTRIC COOPERATIVE, INC.  
P.O. Box 631  
Deming, New Mexico 88031

CONTINENTAL DIVIDE ELECTRIC COOPERATIVE  
P.O. Box 1087  
Grants, New Mexico 87020

DIXIE ESCALANTE RURAL ELECTRIC ASSOCIATION  
CR Box 95  
Beryl, Utah 84714

GARKANE POWER ASSOCIATION, INC.  
P.O. Box 790  
Richfield, Utah 84701

MOHAVE ELECTRIC COOPERATIVE, INC.  
P.O. Box 1045  
Bullhead City, Arizona 86430

MORENCI WATER AND ELECTRIC COMPANY  
P.O. Box 68  
Morenci, Arizona 85540

Stephen Ahearn  
ARIZONA DEPT OF COMMERCE  
ENERGY OFFICE  
3800 North Central Avenue, 12th Floor  
Phoenix, Arizona 85012

Betty Pruitt  
ARIZONA COMMUNITY ACTION ASSOC.  
2627 N. 3rd Street  
Phoenix, Arizona 85004

Choi Lee  
PHELPS DODGE CORP.  
2600 N. Central Avenue  
Phoenix, Arizona 85004-3014

Bradley Carroll  
TUCSON ELECTRIC POWER CO.  
P.O. Box 711  
Tucson, Arizona 85702

Creden Huber  
SULPHUR SPRINGS VALLEY  
ELECTRIC COOPERATIVE  
P.O. Box 820  
Willcox, Arizona 85644

Mick McElrath  
CYPRUS CLIMAX METALS CO.  
P.O. Box 22015  
Tempe, Arizona 85285-2015

Wallace Kolberg  
SOUTHWEST GAS CORP.  
P.O. Box 98510  
Las Vegas, Nevada 89193-8510

A.B. Baardson  
NORDIC POWER  
4281 N. Summerset  
Tucson, Arizona 85715

Michael Rowley  
c/o CALPINE POWER SERVICES  
50 West San Fernando, Suite 550  
San Jose, California 95113

Dan Neidlinger  
3020 N. 17th Drive  
Phoenix, Arizona 85015

Jessica Youle  
PAB300  
SALT RIVER PROJECT  
P.O. Box 52025  
Phoenix, Arizona 85072-2025

Patricia Cooper  
AEP  
P.O. Box 670  
Benson, Arizona 85602-0670

Clifford Cauthen  
GRAHAM COUNTY ELECTRIC CO-OP  
P.O. Drawer B  
Pima, Arizona 85543

Marv Athey  
TRICO ELECTRIC COOPERATIVE  
P.O. Box 35970  
Tucson, Arizona 85740

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Joe Eichelberger  
MAGMA COPPER COMPANY  
P.O. Box 37  
Superior, Arizona 85273

Wayne Retzlaff  
NAVOPACHE ELECTRIC CO-OP INC.  
P.O. Box 308  
Lakeside, Arizona 85929

Craig Marks  
CITIZENS UTILITIES COMPANY  
2901 N. Central Avenue, Suite 1660  
Phoenix, Arizona 85012

Steve Kean  
ENRON  
P.O. Box 1188  
Houston, Texas 77251-1188

Jack Shilling  
DUNCAN VALLEY ELECTRIC COOPERATIVE  
P.O. Box 440  
Duncan, Arizona 85534

Nancy Russell  
ARIZONA ASSOCIATION OF INDUSTRIES  
2025 N. 3rd Street, Suite 175  
Phoenix, Arizona 85004

Barry Huddleston  
DESTEC ENERGY  
P.O. Box 4411  
Houston, Texas 77210-4411

Steve Montgomery  
JOHNSON CONTROLS  
2032 West 4th Street  
Tempe, Arizona 85281

Terry Ross  
CENTER FOR ENERGY AND  
ECONOMIC DEVELOPMENT  
7853 E. Arapahoe Court, Suite 2600  
Englewood, Colorado 80112

Ken Saline  
K.R. SALINE & ASSOCIATES  
160 N. Pasadena  
Suite 101  
Mesa, AZ 85201-6764

Louis A. Stahl  
STREICH LANG  
2 North Central Avenue  
Phoenix, Arizona 85004

Douglas Mitchell  
SAN DIEGO GAS AND ELECTRIC CO.  
P.O. Box 1831  
San Diego, California 92112

Sheryl Johnson  
TEXAS-NEW MEXICO POWER CO.  
4100 International Plaza  
Fort Worth, Texas 76109

Ellen Corkhill  
AARP  
5606 North 17th Street  
Phoenix, Arizona 85016

Phyllis Rowe  
ARIZONA CONSUMERS COUNCIL  
6841 N. 15th Place  
Phoenix, Arizona 85014

Andrew Gregorich  
BHP COPPER  
P.O. Box M  
San Manuel, Arizona

Larry McGraw  
USDA-RUS  
6266 Weeping Willow  
Rio Rancho, New Mexico 87124

Jim Driscoll  
ARIZONA CITIZEN ACTION  
2430 S. Mill, Suite 237  
Tempe, Arizona 85282

William Baker  
ELECTRICAL DISTRICT NO. 6  
P.O. Box 16450  
Phoenix, Arizona 85011

John Jay List  
General Counsel  
NATIONAL RURAL UTILITIES  
COOPERATIVE FINANCE CORP.  
2201 Cooperative Way  
Herndon, Virginia 21071

Office of the City Attorney  
P.O. Box 27210  
Tucson, Arizona 85726-7210

- |    |                                                                                                                                                                    |                                                                                                                                                                                            |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Wallace Tillman<br>Chief Counsel                                                                                                                                   | Douglas Nelson<br>DOUGLAS C NELSON PC<br>7000 N. 16th Street, Suite 120-307<br>Phoenix, Arizona 85020                                                                                      |
| 2  | NATIONAL RURAL ELECTRIC<br>COOPERATIVE ASSOCIATION                                                                                                                 |                                                                                                                                                                                            |
| 3  | 4301 Wilson Blvd.<br>Arlington, Virginia 22203-1860                                                                                                                |                                                                                                                                                                                            |
| 4  |                                                                                                                                                                    | Lawrence V. Robertson Jr.<br>MUNGER CHADWICK PLC<br>333 North Wilmot, Suite 300<br>Tucson, Arizona 85711-2634<br>Attorney for PGE Energy                                                   |
| 5  | Robert Julian<br>PPG<br>1500 Merrell Lane<br>Belgrade, Montana 59714                                                                                               |                                                                                                                                                                                            |
| 6  |                                                                                                                                                                    | Tom Broderick<br>6900 East Camelback Rd. # 700<br>Scottsdale, Arizona 85251                                                                                                                |
| 7  | C. Webb Crockett<br>FENNEMORE CRAIG<br>3003 N. Central Avenue, Suite 2600<br>Phoenix, Arizona 85012-2913                                                           |                                                                                                                                                                                            |
| 8  | Attorneys for Asarco, Inc., Cyprus Climax Metals Co.,<br>Enron, Inc. and AAEC                                                                                      | Albert Sterman<br>ARIZONA CONSUMERS COUNCIL<br>2849 East 8th Street<br>Tucson, Arizona 85716                                                                                               |
| 9  |                                                                                                                                                                    |                                                                                                                                                                                            |
| 10 | Department of Navy<br>Naval Facilities Engineering Command<br>Navy Rate Intervention<br>901 M Street SE, Building 212<br>Washington, DC 20374<br>Attn: Sam DeFrawi | Michael Grant<br>GALLAGHER & KENNEDY<br>2600 N. Central Avenue<br>Phoenix, Arizona 85004<br>Attorneys for AEPCO                                                                            |
| 11 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 12 | Robert S. Lynch<br>340 E. Palm Lane, Suite 140<br>Phoenix, Arizona 85004-4529                                                                                      | Suzanne Dallimore<br>Antitrust Unit Chief<br>Department of Law Building<br>Attorney General's Office<br>1275 West Washington Street<br>Phoenix, Arizona 85007                              |
| 13 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 14 | Douglas A. Oglesby<br>Vantus Energy Corporation<br>353 Sacramento Street, Suite 1900<br>San Francisco, California 94111                                            | Lex Smith<br>Michael Patten<br>BROWN & BAIN PC<br>2901 N. Central Avenue<br>Phoenix, Arizona 85001-0400<br>Attorneys for Morenci Water & Electric,<br>Ajo Improvement & Phelps Dodge Corp. |
| 15 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 16 | Michael Block<br>Goldwater Institute<br>Bank One Center<br>201 North Central<br>Concourse Level<br>Phoenix, Arizona 85004                                          |                                                                                                                                                                                            |
| 17 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 18 | Stan Barnes<br>Copper State Consulting Group<br>100 W Washington Street, Suite 1415<br>Phoenix, Arizona 85003                                                      | Vinnie Hunt<br>CITY OF TUCSON<br>Department of Operations<br>4004 S. Park Avenue, Building #2<br>Tucson, Arizona 85714                                                                     |
| 19 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 20 | Carl Robert Aron<br>Executive Vice President and COO<br>Itron, Inc.<br>2818 N. Sullivan Road<br>Spokane, Washington 99216                                          | Steve Wheeler<br>Thomas M. Mumaw<br>SNELL & WILMER<br>One Arizona Center<br>400 E. Van Buren Street<br>Phoenix, Arizona 85004-0001<br>Attorneys for APS                                    |
| 21 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 22 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 23 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 24 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 25 |                                                                                                                                                                    |                                                                                                                                                                                            |
| 26 |                                                                                                                                                                    |                                                                                                                                                                                            |

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Albert Sterman  
ARIZONA CONSUMER COUNCIL  
2849 E. 8th Street  
Tucson, Arizona 85716

William Sullivan  
MARTINEZ & CURTIS, P.C.  
2716 N. 7th Street,  
Phoenix, Arizona 85006  
Attorneys for Mohave Electric Cooperative and  
Navopache Electric Cooperative

Elizabeth S. Firkins  
INTERNATION BROTHERHOODL OF  
ELECTRICAL WORKERS, L.U. #1116  
750 S. Tucson Blvd.  
Tucson, Arizona 85716-5698

Norman J. Furuta  
Associate Counsel  
Engineering Field Activity West  
Naval Facilities Engineering Command  
900 Commodore Drive, Bldg. 107  
San Bruno, California 94066-5006

Jeff Woner  
K.R. Saline & Associates  
160 N. Pasadena  
Mesa, Arizona 85201

Carl Dabelstein  
2211 E. Edna Avenue  
Phoenix, Arizona 85022

Larry K. Udall  
Arizona Municipal Power Users' Assoc.  
2712 N. 7th Street  
Phoenix, Arizona 85006-1090

Roderick G. McDougall  
City Attorney  
Attn: Jesse Sears, Assistant Chief Counsel  
200 W Washington Street, Suite 1300  
Phoenix, Arizona 85003-1611

William J. Murphy  
200 W Washington Street, Suite 1400  
Phoenix, Arizona 85003-1611

Russell E. Jones  
33 N. Stone Ave., Suite 2100  
P.O. Box 2268  
Tucson, Arizona 85702  
Attorneys for Trico Electric Cooperative, Inc.

Christopher Hitchcock  
P.O. Box 87  
Bisbee, Arizona 85603-0087  
Attorneys for Sulphur Springs Valley  
Electric Cooperative, Inc.

Myron L. Scott  
1628 E. Southern Avenue, No. 9-328  
Tempe, AZ 85282-2179  
Attorneys for Arizona for a Better Environment

Andrew Bettwy  
Debra Jacobson  
SOUTHWEST GAS CORPORATION  
5241 Spring Mountain Road  
Las Vegas, Nevada 89102

Barbara R. Goldberg  
OFFICE OF THE CITY ATTORNEY  
3939 Civic Center Blvd.  
Scottsdale, Arizona 85251

Terry Ross  
Center for Energy & Economic Development  
P.O. Box 288  
Franktown, Colorado 80116

Peter Glaser  
DOHERTY RUMBLE & BUTLER PA  
1401 New York Ave., N.W., Suite 1100  
Washington, DC 20005

Phyllis Rowe  
ARIZONA CONSUMERS COUNCIL  
P.O. Box 1288  
Phoenix, Arizona 85001

Paul Bullis, Chief Counsel  
Legal Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Director Utilities Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007