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CHRISTOPHER HITCHCOCK  
PERRY L. HICKS  
JAMES L. CONLOGUE  
TELEPHONE (520) 432-2279/432-5305  
TELECOPIER (520) 432-5152

# Hicks & Conlogue

ATTORNEYS AT LAW  
COPPER QUEEN PLAZA  
P.O. BOX 87  
BISBEE, ARIZONA 85603-0087

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LAW OFFICES OF FRED SUTTER	1913
SUTTER, ROCHE & GENTRY	1928
GENTRY & GENTRY	1949
GENTRY, McNULTY & KIMBLE	1955
GENTRY, McNULTY & DESENS	1979
DESENS & HITCHCOCK	1986

September 18, 1998

Arizona Corporation Commission  
**DOCKETED**

SEP 21 1998

DOCKETED BY	<i>[Signature]</i>
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Chairman - Commissioner Jim Irvin  
Commissioner Renz D. Jennings  
Commissioner Carl K. Kunasek  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

Re: Sulphur Springs Valley Electric Cooperative (SSVEC)  
Comments on Amended Electric Completion Rules;  
Docket No. RE-00000C-94-0165

Dear Commissioners:

Pursuant to the Procedural Order dated August 11, 1998, Sulphur Springs Valley Electric Cooperative (SSVEC) submits these comments on the Proposed Rules. Because the Proposed Rules are the same as the Amended Rules which were adopted on an emergency basis by Decision No. 61071, SSVEC incorporated by reference (i) the written comments of Arizona Electric Power Cooperative, Inc. Dated July 6, 1998 and (ii) SSVEC's Application for Rehearing of Decision No. 61071 dated August 27, 1998.

Sincerely,

HITCHCOCK, HICKS & CONLOGUE

By *Christopher Hitchcock*

Christopher Hitchcock

CH:lmr  
Enclosure (10 copies)