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ORIGINAL

State Association

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AZ CORP COMMISSION

May 12 12 13 PM '99
of
Electrical Workers



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May 10, 1999

Arizona Corporation Commission
DOCKETED

MAY 12 1999

James M. Irvin, Commissioner
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

DOCKETED BY
[Signature]

RE-00000C-94-0165

Dear Commissioner Irvin:

With reference to: APPENDIX A

TITLE 14. PUBLIC SERVICE CORPORATIONS AND ASSOCIATIONS;
SECURITIES REGULATION
CHAPTER 2. CORPORATION COMMISSION - FIXED UTILITIES
ARTICLE 16. RETAIL ELECTRIC COMPETITION

R14-2-1601. Definitions

In this article, unless the context otherwise requires:

40. "Utility Distribution Company" (UDC) means the electric utility entity regulated by the Commission that operates constructs and maintains the distribution system for the delivery of power to the end user point of delivery on the distribution system.

In the above referenced paragraph the word **constructs** has been stricken. The elimination of that word causes the Arizona State Association of Electrical Workers, which represents the employees of Arizona Utilities, great cause for concern. We **strongly** object to the elimination of this word for obvious reasons.

When utilities were awarded Certificates of Convenience and Necessity (CCN) to be the supplier of electricity in their service territory they entered into a **compact** not only with the Arizona Corporation Commission but also with the citizens and ratepayers of

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Arizona. And in that compact with the citizens and ratepayers of Arizona, it was understood that the utility would deliver electricity in a safe and reliable fashion. To accomplish this, the utilities committed to constructing, operating and maintaining safe, reliable distribution systems. To meet the commitment to their customers the incumbent utilities built a workforce of highly skilled and trained employees to utilize in the construction, maintenance and operation of their distribution systems. It required a great financial commitment on the utilities part to train and develop their workforces. The construction of distribution systems has been done for the most part with in house utility workforces; and it is that workforce which has been responsible for the construction, operation and maintenance of a safe, reliable and efficient electrical distribution system to meet the needs of its customers.

That is why **we vehemently oppose** the striking of the word "**constructs**" from the definition of "Utility Distribution Company".

I hope that we can count on your support and that of the commission staff as well in keeping the word "**constructs**" in.

Respectfully,

William Turner
William Turner
President

WT/evma

cc: Gene Hill, IBEW #387
Joel Bell, IBEW #769
Ryle J. Carl III, IBEW #1116
Ray Nunez, IBEW #266
Steve Speer, IBEW #640

