

GALLAGHER & KENNEDY
A PROFESSIONAL ASSOCIATION



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

Arizona Corporation Commission
MAY 13 1999

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Re: Technical Workshop Issues

Dear Mr. Williamson:

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AEPCO would suggest the following issues for consideration in workshops:

- The development of standard Service Acquisition and Scheduling Coordinator Agreements. This would not mean parties could not, however, deviate from the standard forms where circumstances warrant.
- Several issues concerning distribution operations as to, for example, loss accounting and load profiling for non-homogenous customer groups need to be addressed and resolved.
- Several cost recovery issues should be addressed. Among them are the investments necessary to develop electronic data interchange systems and interface software to share data with MRSP's.

AEPCO will be pleased to participate in a workshop(s) to address these and other issues raised by interested parties.

Very truly yours,

GALLAGHER & KENNEDY

By

Michael M. Grant

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