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AZ CORP COMMISSION  
JUN 3 2 23 PM '99  
LAW OFFICES OF FRED SUTTER ..... 1913  
SUTTER, ROCHE & GENTRY ..... 1928  
GENTRY & GENTRY ..... 1949  
GENTRY, McNULTY & KIMBLE ..... 1955  
GENTRY, McNULTY & DESENS ..... 1979  
DESENS & HITCHCOCK ..... 1986

DOCUMENT CONTROL

June 2, 1999

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

Re: Docket No. RE-00000C-94-0165

Dear Sir/Madam:

I have enclosed the original and ten copies of Sulphur Springs Valley Electric Cooperative, Inc.'s Comments and Response to Comments regarding the electric competition rules.

Please do not hesitate to contact me if you have any questions.

Sincerely,

HITCHCOCK, HICKS & CONLOGUE

By

Christopher Hitchcock

CH/lmr

Enclosures

cc: C.W. Huber, SSVEC  
Board of Directors



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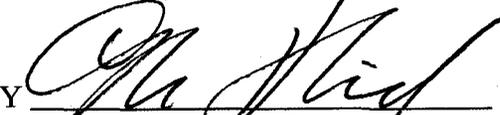
SSVEC support Staff's clarification on the disconnect situation in R-14-2-1612R.

SSVEC would object to Staff's proposal regarding code of conduct between itself and AEPCO. SSVEC is not an affiliate of AEPCO, it is a separate company. To require a code of conduct in this situation would be like requiring a code of conduct between any ESP and a UDC.

In regard to Staff's requirement that a UDC provide generation related information, such as, "Generation, Competition Transition Charge, Must-Run Generating Units, Distribution Services", etc., such information is generally not available to a UDC. The section should be written to require that any such generation information required to be discharged to the customer, be provided to the UDC by the generation owner. Otherwise there is no practical way to obtain such information.

RESPECTFULLY SUBMITTED this 2 day of June, 1999.

HITCHCOCK, HICKS & CONLOGUE

BY 

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ORIGINAL and ten (10) copies of  
the foregoing filed this 2nd  
day of June, 1999, with:

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

Copy of the foregoing mailed this  
2nd day of June, 1999, to:

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

Paul Bullis, Chief Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

All other parties listed on the Docket

  
Laura M. Room