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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Commissioner - Chairman
JIM IRVIN
Commissioner
WILLIAM A. MUNDELL
Commissioner

Arizona Corporation Commission

DOCKETED

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AZ CORP COMMISSION
DOCUMENT CONTROL

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IN THE MATTER OF COMPETITION IN THE)
PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA.)

DOCKET NO. RE-00000C-94-0165

IN THE MATTER OF THE STRANDED)
COST FILING AND REQUEST FOR A)
WAIVER OF CERTAIN PORTIONS OF)
THE RULES FILED BY MOHAVE)
ELECTRIC COOPERATIVE, INC.)

DOCKET NO. E-01787A-98-0465

IN THE MATTER OF THE FILING BY)
MOHAVE ELECTRIC COOPERATIVE, INC.)
OF UNBUNDLED AND STANDARD OFFER)
SERVICE TARIFFS PURSUANT TO)
A.A.C. R14-2-1606.)

DOCKET NO. E-01750A-97-0701

**MOTION TO CONTINUE
HEARING DATE**

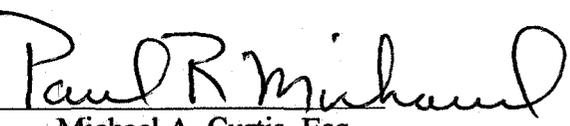
Mohave Electric Cooperative, Inc. ("Mohave"), by and through counsel undersigned, respectfully moves the Hearing Division to continue the hearing in the above-captioned matter from November 18, 1999, to a date after the Arizona Electric Power Cooperative, Inc.'s ("AEPKO") stranded cost proceeding is completed and a final order regarding AEPKO's stranded cost methodology is issued by the Commission, for the reason that Mohave cannot develop its stranded cost recovery plan until after AEPKO's stranded cost methodology is known. This Motion is supported by the attached Memorandum of Points and Authorities.

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DATED this 9th day of November, 1999.

MARTINEZ & CURTIS, P.C.

By 

Michael A. Curtis, Esq.
Paul R. Michaud, Esq.
2712 North Seventh Street
Phoenix, Arizona 85006-1090
Attorneys for Mohave Electric
Cooperative, Inc.

MEMORANDUM OF POINT AND AUTHORITIES

I. BACKGROUND

The Hearing Division's April 21, 1999, Procedural Order set Mohave's stranded cost/unbundled tariffs hearing ("stranded cost hearing") for October 13, 1999. This Procedural Order also set AEPCO's stranded cost hearing for September 1, 1999.

As a result of the September 24, 1999 pre-hearing conference, the Hearing Division continued Mohave's stranded cost hearing to November 18, 1999, to allow time for AEPCO's matter to be completely resolved before the commencement of Mohave's stranded cost hearing.

Since the April 21, 1999 pre-hearing conference, however, AEPCO's stranded cost hearing has been continued several times in order to allow the parties time to reach a settlement. AEPCO's stranded cost hearing is now delayed until November 19, 1999, the day after Mohave's stranded cost hearing is scheduled to commence.

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1 **II. ARGUMENT**

2 **MOHAVE'S STRANDED COST PLAN CANNOT BE DETERMINED UNTIL**
3 **THE OUTCOME OF AEPCO'S STRANDED COST PROCEEDING IS KNOWN.**

4 Mohave is a non-profit electric distribution cooperative and currently purchases all of
5 its energy requirements under the terms and conditions of an all-requirements power purchase
6 agreement with the Arizona Electric Power Cooperative, Inc. ("AEPCO"). Furthermore,
7 AEPCO is in the process of a major restructuring which will likely impact the allocation of
8 costs between AEPCO and Mohave. As such, any plan for recovery of stranded costs by
9 Mohave is dependant on the outcome of AEPCO's stranded cost proceeding. AEPCO's
10 stranded cost proceeding was originally scheduled to be completed well before the
11 commencement of Mohave's stranded cost proceeding. After several continuances, however,
12 AEPCO's stranded cost proceeding is delayed until November 19, 1999, one day after
13 Mohave's stranded cost hearing is scheduled to commence. Thus, it is impossible for Mohave
14 to know the outcome of AEPCO's stranded proceeding, in order to develop its own stranded
15 cost plan, by its November 18, 1999 hearing date. Therefore, it is reasonable that Mohave's
16 stranded cost hearing be continued to a date after AEPCO's stranded cost proceeding is
17 completed and a final order regarding AEPCO's stranded cost methodology is issued by the
18 Commission.

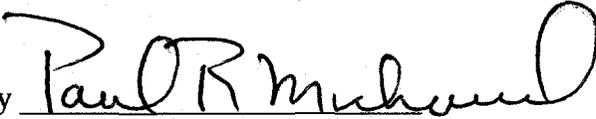
19 **WHEREFORE, Navopache respectfully requests that Mohave's stranded cost hearing**
20 **be continued from November 18, 1999, to a date after AEPCO's stranded cost proceeding is**
21 **completed and a final order regarding AEPCO's stranded cost methodology is issued by the**
22 **Commission.**

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RESPECTFULLY SUBMITTED, this 9th day of November, 1999.

MARTINEZ & CURTIS, P.C.

By 

Michael A. Curtis, Esq.
Paul R. Michaud, Esq.
2712 North Seventh Street
Phoenix, Arizona 85006-1090
Attorneys for Mohave Electric
Cooperative, Inc.

**The original and ten (10) copies of
the foregoing are filed this 9th day
of November, 1999 with:**

DOCKET CONTROL
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

**A copy of the foregoing is faxed and mailed
this 9th day of November, 1999 to:**

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

Jane Rodda, Hearing Officer
Hearing Division
Arizona Corporation Commission
400 West Congress
Tucson, Arizona 85701-1347

Janet Wagner, Attorney
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

1 Russell E. Jones
2 O'Connor Cavanagh Molloy & Jones
3 33 North Stone Avenue, Suite 2100
4 Tucson, Arizona 85702
5 Attorneys for Trico Electric Cooperative,
6 Inc.

7 Steven M. Wheeler
8 Thomas L. Mumaw
9 Snell & Wilmer, L.L.P.
10 One Arizona Center
11 Phoenix, Arizona 85004
12 Attorneys for Arizona Public
13 Service Company

14 Barbara J. Klemstine
15 Arizona Public Service Company
16 400 North 5th Street
17 Phoenix, Arizona 85072-3999

18 C. Webb Crockett
19 Jay L. Shapiro
20 Fennemore Craig
21 3003 North Central Avenue
22 Suite 2600
23 Phoenix, Arizona 85012-2913
24 Attorneys for ASARCO et al.

25 Lex Smith
26 Michael Patten
Brown & Bain, P.A.
2901 North Central Avenue
Suite 2000
P.O. Box 400
Phoenix, Arizona 85001-0400
Attorneys for Illinova Energy Partners

Betty Pruitt
ACAA
2627 North 3rd Street
Suite 2
Phoenix, Arizona 85004

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Douglas C. Nelson
7000 N. 16th Street
#120-301
Phoenix, Arizona 85020
Attorney for Commonwealth
Energy Corp.

Michael Grant
Gallagher & Kennedy
2600 N. Central Avenue
Phoenix, Arizona 85004

Christopher Hitchcock
Hitchcock, Hicks & Conlogue
Copper Queen Plaza
P.O. Box 87
Bisbee, Arizona 85603-0087

By PAM