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A CORPORATION COMMISSION

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Arizona Corporation Commission
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CARL J. KUNASEK
Chairman
JIM IRVIN
Commissioner
WILLIAM A. MUNDELL
Commissioner

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

**COOPERATIVES' REQUEST
FOR AN EXTENSION OF TIME
TO FILE THEIR CODE OF
CONDUCT**

The Cooperatives¹ jointly request an extension of time until February 4, 2000 in which to file their proposed Code of Conduct(s) pursuant to A.A.C.R14-2-1616.A. The Cooperatives need the additional time in which to prepare, discuss and finalize among Sierra, AEPCO and its five Member Distribution Cooperatives the proposed Code of Conduct(s). Because seven different cooperatives are involved, this makes the logistics of this process more difficult than for other Affected Utilities.

The Commission has not entered orders concerning the Cooperatives' stranded costs and, in all likelihood, will not do so until March 2000 at the earliest. In light of this and pursuant to R14-2-1602, the Cooperatives' service territories are not open to competition and Sierra is not delivering competitive services in the Member Distribution Cooperatives' service territories. Neither, for these reasons, is Sierra delivering competitive services in any other Affected Utility's

¹ The Arizona Electric Power Cooperative, Inc. ("AEPCO"); Sierra Southwest Electric Power Services Cooperative, Inc. ("Sierra"); Duncan Valley Electric Cooperative, Inc.; Graham County Electric Cooperative, Inc.; Mohave Electric Cooperative, Inc.; Sulphur Springs Valley Electric Cooperative, Inc.; and Trico Electric Cooperative, Inc. (collectively "the Member Distribution Cooperatives").

1 territory. Therefore, the requested extension will not impact any other interest because no
2 delivery of competitive services is currently occurring nor will occur for several months.

3 In light of the foregoing, the Cooperatives request that they be granted an extension of
4 time in which to file their proposed Code of Conduct(s) until February 4, 2000.

5 RESPECTFULLY SUBMITTED this 17th day of December, 1999.

6 GALLAGHER & KENNEDY, P.A.

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8
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14 Original and ten (10) copies of the foregoing
15 filed this 17th day of December, 1999, with:

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17 Arizona Corporation Commission
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20 Copy of the foregoing delivered this
21 17th day of December, 1999, to:

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