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Arizona Corporation Commission

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Commissioner

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WILLIAM A. MUNDELL

Commissioner

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

Docket No. RE-0000C-94-0165

**COMMENTS OF ENRON CORP. ON ARIZONA PUBLIC SERVICE  
 COMPANY'S APPLICATION FOR WAIVER OF CERTAIN REQUIREMENTS  
 OF A.C.C. R14-2-1609**

Pursuant to the opportunity for comment, which has been allowed by the Commission, Enron Corp. hereby submits the following comments on the application for waiver of certain requirements of A.C.C. R14-2-1609.

Enron Corp. opposes Arizona Public Service Company's ("APS") December 23, 1999 application for a complete waiver from the provisions of A.C.C. R14-2-1609 ("Rule 1609"). However, Enron Corp. does not oppose a temporary extension in the current deadline(s) for complying with said provisions, coupled with periodic reporting by APS.

Enron Corp. strongly believes APS has a responsibility as a transmission owner to press for full implementation of the Arizona Independent Scheduling Administrator ("AISA") protocols. A complete waiver would eliminate APS's accountability with respect to the process of implementing the AISA and its protocols, thereby delaying retail competition that the Commission has determined is in the public interest.

1           The very nature of the AISA represents independence, therefore, it is true that  
2    APS does not have the ability to unilaterally control the AISA or to compel the AISA to  
3    move forward. In that regard, independence is a key element in providing non-  
4    discriminatory retail access and Enron Corp. has continually supported the AISA.  
5    However, a complete waiver from the aforementioned provisions would effectively  
6    eradicate the Commission's ability to oversee the AISA implementation.

7           Accordingly, Enron Corp. hereby respectfully requests the Commission deny  
8    APS's request for a complete waiver from the provisions of Rule 1609.

9           RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of December 1999.

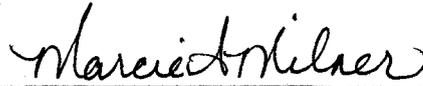
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ENRON CORP.

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Marcie A. Milner

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Regulatory Affairs Representative

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