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AZ CORP COMMISSION
DOCKET CONTROL

January 25, 2011

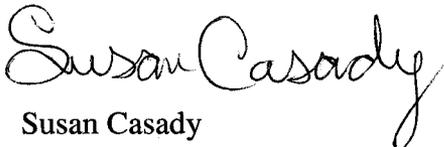
Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

RE: IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF THE COMPANY'S 2011 DEMAND SIDE MANAGEMENT IMPLEMENTATION PLAN.
DOCKET NO. E-01345A-10-0219

Pursuant to R14-2-2405 (A), Arizona Public Service Company ("APS" or "Company") is required, within 30 days of the effective date¹ of the Electric Energy Efficiency Standards Rules, to file an initial implementation plan describing how the Company intends to meet the Electric Energy Efficiency Standard. In fact, APS filed its 2011 Demand Side Management Implementation Plan ("2011 Plan") on June 1, 2010 and such 2011 Plan is pending before the Commission in Docket No. E-01345A-10-0219. The 2011 Plan describes how APS intends to meet the Electric Energy Efficiency Standard for 2011. It is the Company's position that APS's 2011 Plan fulfills the Electric Energy Efficiency Standard requirements for an initial implementation plan under R14-2-2405.

If you have any questions regarding this information, please contact Erinn Andreasen at (602) 250-3276.

Sincerely,

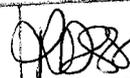

Susan Casady

SC/sl

cc: Terri Ford
Brian Bozzo
Julie McNeely-Kirwan

Arizona Corporation Commission
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¹ The Electric Energy Efficiency Standard Rules became effective January 1, 2011.