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RESOURCE MANAGEMENT  
INTERNATIONAL, INC.

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January 6, 1999

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

Subject: Proposed Procedure for Resolution of Certain Pending Electric Industry  
Restructuring Issues, Docket No. RE-00000C-94-0165 and Related Dockets

Dear Mr. Rudibaugh:

The Land and Water Fund (LAW Fund) supports the proposed procedure for resolving matters pertaining to electric industry restructuring as presented by the Attorney General and the Residential Utility Consumer Office. The LAW Fund has been participating in the meetings coordinated by the Attorney General and believes that this attempt to continue settlement efforts may be fruitful. The Commission's explicit support of the parties' efforts within the time frame envisioned by the proposed procedural schedule would provide additional momentum for resolution of outstanding issues.

Any amendments to the competition rules (A.A.C. R14-2-1601 *et seq.*) should be limited in scope to address ambiguities in the rules and perhaps inconsistencies between settlement efforts and the rules. The Commission has made great progress in opening electric markets to competition and the entire scope of the rules need not be revisited.

Thank you for your consideration of the proposed schedule.

Sincerely,

David Berry  
Executive Consultant

cc:

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