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Mesa, Arizona 85206-3002



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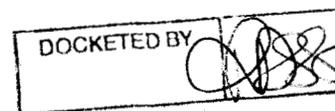
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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

May 16, 2011

Arizona Corporation Commission
DOCKETED

MAY 16 2011



Linda J. Arnold
Pinnacle West Capital Corporation Law Department
400 North Fifth Street, Station 8695
Phoenix, AZ 85072-3999

**Re: Lynn A Wheeler v. Arizona Public Service Company
ACC Docket No. E-01345A-10-0201**

Dear Ms. Arnold:

Please find attached the First Set of Data Requests from Lynn A. Wheeler to APS District Serviceman Gregory D. Cox in the above-referenced matter.

This data request is a result of the direction given by Administrative Law Judge Yvette B. Kinsey during the Procedural Conference conducted on April 15, 2011. Your answers or any documents supplied in response to this data request should be supplemented with any additional information or documents that come to your attention after you have provided your initial responses. Please respond within **seven** calendar days following the receipt of this letter.

We will accept electronic service of your response, including all attachments, to:

Lynn A. Wheeler: lwheeler@cox.net

If you wish to discuss further or have any questions, please do not hesitate to call me at 602-881-7291.

Sincerely,

Lynn A. Wheeler
General Manager & Partner

Atch: First Set of Data Requests for Greg Cox

**DATA REQUEST
FROM LYNN A. WHEELER
TO MR. GREGORY D. COX, DISTRICT SERVICEMAN
FOR ARIZONA PUBLIC SERVICE COMPANY**

(Docket No. E-01345A-10-0201)

May 16, 2011

- Q. 1.1 Please provide background information concerning your employment with Arizona Public Service ("APS") to include, but not limited to:
- a. Number of years employed by APS.
 - b. Number of years working at your present position.
 - c. Responsibilities of job at your present position.
 - d. Previous jobs you have held while employed by APS.
 - e. Responsibilities of job at your previous positions while employed by APS.
- Q. 1.2 Please confirm you are the APS District Serviceman who discovered the low-voltage condition at the covert general service customer in question.
- Q. 1.3 Please provide the date of the discovery of the low-voltage situation in question.
- Q. 1.4 Please provide a detailed narrative on how you found the low-voltage situation at the covert general service customer in question to include, but not limited to:
- a. Why were you going to the general service customer to begin with?
 - b. Was a problem reported by the general service customer?
 - c. Were you instructed by your supervisor to go to this location, fix the problem and insure there would be no problems in the future?
 - d. Who is your supervisor/superior?
 - e. Did your supervisor or any other superior provide instruction on what to do when you arrived at the general service customer in question? If so, what were the instructions?
 - f. Please provide a copy of the "Call-out Report" or "Trouble Sheet" that you received to initiate action for the general service customer.
 - g. Why were you testing the voltage level?
 - h. Was there a reason for testing the voltage level other than your own initiative?
- Q. 1.5 Please provide the reading of the volt meter when you first tested and determined the low-voltage situation at the general service customer in question.
- a. The voltage level on the primary side.
 - b. The voltage level on the secondary side.
- Q. 1.6 In your opinion, what was causing the low-voltage situation for this general service customer?
- Q. 1.7 Please provide a detailed narrative of your actions after you determined the low-voltage situation at the general service customer in question to include, but not limited to:
- a. The date you notified the general service customer of the low-voltage situation.
 - b. The information and guidance you provided to the general service customer.

- c. The date the recording voltmeter was recommended.
- d. The date the recording voltmeter was installed.
- e. The date the recording voltmeter was removed.
- f. The date the job order was initiated to install a voltage regulator bank
- g. Please confirm the voltage regulator bank was installed on 3/07/2008.
- h. Did you file a verbal or written report of the actions taken to resolve the problem?
- i. Please provide information conveyed in the report to include conditions found and actions taken.
- j. Please provide a copy of the written report that was accomplished in "Item i."
- k. Please provide a narrative of any verbal report that was given to your supervisor/superior concerning what you found and any recommendations you had to resolve the issues for this general service customer.

Q. 1.8 Were any alternative actions considered to rectify the low-voltage problem other than installing a voltage regulator bank? If so, please provide a description of the alternatives.

Q. 1.9 Please provide information concerning the results of the recording voltmeter that was installed at the general service customer in question, prior to the installation of the voltage regulator bank, to include, but not limited to:

- a. Results and or information that was provided to you.
- b. Results and or information that was provided to the general service customer in question.

Q. 1.10 Please provide information on the amount, size and type of equipment being used by the general service customer in question. (i.e. four 50-hp pumps or two ½ hp evaporative coolers)

Q. 1.11 Please provide information on how the low-voltage power being supplied to the customer in question affected the equipment being used by the customer as listed in Question Number 1.10.

Q. 1.12 Please provide information on what actions were taken to temporarily raise the voltage level going to the general service customer in question between the low-voltage date of discovery and the date the voltage regulator bank was installed.

Q. 1.13 Please provide information on how the installation of the voltage regulator bank impacted the electrical power being supplied to the customer in question to include, but not limited to:

- a. The voltage level on the primary side.
- b. The voltage level on the secondary side.

Q. 1.14 Please provide information on any contact, interaction or conversation you had with the customer in question after the voltage regulator bank was installed.

Q. 1.15 Were any tests conducted on the general service customer's equipment to determine if there was any damage as a result of the low-voltage situation? If so, what were the tests and the test results?

Q. 1.16 Please provide information concerning the results of the recording voltmeter that was installed at the general service customer in question, after the voltage regulator bank was installed, to include, but not limited to:

- a. Results and/or information that was provided to you.
- b. Results and/or information that was provided to the general service customer in question.

Q. 1.17 Please provide information on other customers on Gila Bend Feeder #22 who have experienced low-voltage situations.