

ORIGINAL
THE HARCUVAR COMPAN



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Tucson Electric Power
E-01933A-07-0402
E-01933A-05-0650

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June 13, 2011

Arizona Corporation Commission
DOCKETED

JUN 21 2011

Mr. Gary Pierce
Chairman
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007-2927

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| DOCKETED BY | <i>RDS</i> |
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Re: Potential Reinstatement of TEP's Historic Line Extension Tariff
Docket Nos. E-01933A-07-0402, E-01933-05-0650 and E00000J-10-0044

Dear Sir:

In response to your letter dated June 03, 2011, I offer the following.

- (1) I would not oppose reopening Decision No. 70628 for the narrow purpose of considering reinstatement of TEP's line extension tariff. Every electrical utility in this state should have the same done, especially APS. No utility should add any asset to its rate base until it has paid for it. Water utilities can't do it, why should electrical utilities be allowed.
- (2) There is no alternative that I would support.
- (3) I think an evidentiary hearing is in order to show that electrical utilities are (a) operating assets that were paid for by the using customer and by the rate payers through rate increases and (b) earning net revenues on those same assets in quantities more than sufficient to finance the construction themselves.

Should you require anything further, please advise.

Sincerely,

James D. Downing, P.E.

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