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SEP 27 2011

September 27, 2011

DOCKETED BY *[Signature]*

Via E-Mail and U.S. Mail

Darron Carlson  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Re: Morenci Water & Electric Company – Rate Application  
Docket Nos. W-01049A-11-0311

Dear Mr. Carlson:

The purpose of this letter is to request an extension of time in Docket No. W-01049-11-0311 – to determine sufficiency regarding Morenci Water & Electric Company (“MWE” or “Company”) rate application for its Water Department.

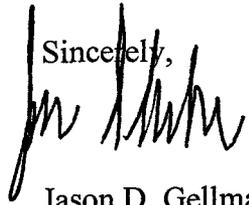
MWE is making this request so that Staff has ample time to review the revised bill count information provided regarding MWE’s Morenci and Clifton water systems. This will also allow the Company to address any Staff concerns regarding the revised bill counts for both systems. Further, MWE understands that Staff has a further request for water use data sheets by month for the 2010 calendar year. MWE will need some time to provide that information to Staff. Therefore, MWE believes a further extension of time for sufficiency is in the best interests of both the Company and Staff.

MWE formally requests an additional extension of the sufficiency timeframe, through October 31, 2011, for this application in Docket No. W-01049A-11-0311. Because MWE intends to have the rate application for both its Electric and Water Departments processed along the same timeline, the Company is also making this request in Docket No. E-01049A-11-0300. Further, we understand that MWE's applications will be declared sufficient once this information is provided and Staff has ample opportunity to review. An extension to October 31<sup>st</sup> should give enough time to address remaining concerns and issues for sufficiency purposes.

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Darron Carlson  
September 27, 2011  
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Please do not hesitate to contact me should you have any questions or concerns about this request. Thank you for your time and consideration

Sincerely,  
  
Jason D. Gellman

JDG/da

cc: Docket Control (original + 13 copies)  
Robin Mitchell  
Roy Archer  
Dan Neidlinger