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AZ CORP COMMISSION
DOCKET CONTROL Arizona Corporation Commission

DOCKETED

OCT 28 2011

Attorneys for Intervenor IBEW Local 1116

BEFORE THE ARIZONA

CORPORATION COMMISSION

DOCKETED BY

IN THE MATTER OF THE
APPLICATION OF UNS GAS, INC.
FOR THE ESTABLISHMENT OF JUST
AND REASONABLE RATES AND
CHARGES DESIGNED TO REALIZE
A REASONABLE RATE OF RETURN
ON THE FAIR VALUE OF ITS
ARIZONA PROPERTIES.

Docket No. G-04204A-11-0158

**INTERVENOR IBEW LOCAL
1116'S UNOPPOSED MOTION FOR
AN ENLARGEMENT OF TIME
(First Request)**

Pursuant to A.A.C. R14-3-101(A) and, in turn, Rule 6(b)(1), Ariz.R.Civ.P., Local Union 1116, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 1116") hereby requests that the Administrative Law Judge enlarge the time allowed for it - and only it - to file its direct testimony from today, October 28, 2011, to Thursday, November 10, 2011. Undersigned counsel has conferred with counsel for the other three parties to this proceeding and none of them opposes this motion.

The extension is necessary in light of the fact that undersigned counsel and his staff were somewhat confused by the phraseology set forth on page 4, lines 1 to 6 of the Procedural Order dated June 3, 2011. Further adding to the confusion as to what was actually intended to be due today (as opposed to November 10, 2011) is the fact that undersigned counsel did not participate in procedural conferences and discussions predating IBEW Local 1116's grant of intervention on August 2, 2011. Whatever the case may be, undersigned counsel needs a few additional days to complete the Direct Pre-Filed Testimony of IBEW Local 1116's principal officer, Frank Grijalva.

1 Given the relatively limited scope of IBEW Local 1116's forthcoming testimony,
2 IBEW Local 1116 does not believe that this request will not in any way interfere with
3 either the commencement of the hearing in this case or the ability of dissenting views to
4 rebut the points to be raised in IBEW Local 1116's forthcoming testimony.

5 WHEREFORE, it is respectfully requested that the Administrative Law Judge
6 issue an Order enlarging the time allowed for IBEW Local 1116 to file all of its direct
7 testimony to Thursday, November 10, 2011.

8 RESPECTFULLY SUBMITTED this 28th day of October 2011.

9 LUBIN & ENOCH, P.C.

10 

11 _____
12 Nicholas J. Enoch, Esq.
Attorney for Intervenor IBEW Local 1116

13 Original and thirteen (13) copies
14 of IBEW Local 1116's Motion filed this
28th day of October 2011, with:

15 Arizona Corporation Commission
16 Docket Control Center
1200 West Washington Street
Phoenix, Arizona 85007-2996

17 Copies of the foregoing
18 transmitted electronically
this same date to:

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