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BEFORE THE ARIZONA CORPORATION CC

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Arizona Corporation Commission

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AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY

COMMISSIONERS

GARY PIERCE- Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR A HEARING TO DETERMINE THE
FAIR VALUE OF THE UTILITY PROPERTY
OF THE COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN
THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN

DOCKET NO. E-01345A-11-0224

**STAFF'S MOTION TO FILE THE DIRECT
TESTIMONY OF LAURA FURREY ON
DECEMBER 2, 2011**

Staff of the Arizona Corporation Commission ("Staff") hereby moves to file the Direct Testimony of Laura Furrey, one of its witnesses in this case, on December 2, 2011. The July 29, 2011 Procedural Order in this matter set November 18, 2011, as the deadline for filing Staff and Intervenor Direct Testimony (other than Rate Design) and December 2, 2011 as the deadline for filing Staff and Intervenor Rate Design Testimony. In addition to the testimony of Ms. Furrey, Staff will be presenting testimony of at least five (5) other witnesses in this case. Staff witness Furrey will be filing testimony which addresses several issues relating to the Arizona Public Service Company's ("APS" or "Company") renewable and energy efficiency adjustor mechanisms.

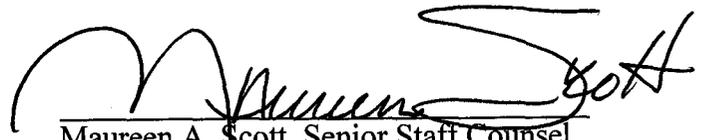
While it is unlikely that all of Ms. Furrey's testimony can be classified as rate design related, the extension is necessary due to the volume of Ms. Furrey's workload at this time. Ms. Furrey is currently working on a Staff memo and recommended order regarding APS' 2012 DSM Implementation Plan (Docket No. E-01345A-11-0232) as well as testimony which must be docketed on November 21, 2011 for Mohave Electric Cooperative's Application for Approval of a Waste-to-Energy Facility as a Pilot Program Under the Renewable Energy Rules or, in the Alternative, for a Limited Waiver (Docket No. E-01750A-10-0453). Both of these matters require extensive analysis and preparation time. Since Ms. Furrey is the primary staff person assigned to these matters and has

1 already done significant work on both of these matters, transferring her responsibilities to other Staff
2 persons would not be productive and could result in significant delay.

3 Granting this limited extension should not prejudice APS or other parties in any fashion.
4 Staff intends to file the non-rate-design testimony of its other witnesses on November 18, 2011. Ms.
5 Furrey's testimony is limited to two very narrow areas and its filing on December 2, 2011 will still
6 allow APS and other parties to file responsive testimony on the issues raised in the testimony. In
7 addition, Staff is not proposing any changes to the schedule in this case.

8 WHEREFORE, Staff respectfully requests that the Commission grant its motion to file the
9 Direct Testimony of Laura Furrey on December 2, 2011, the deadline for filing rate design testimony
10 in this case.

11 RESPECTFULLY SUBMITTED this 8th day of November 2011.

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13 

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23 Original and thirteen (13) copies
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25 8th day of November 2011 with:

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