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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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

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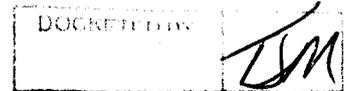
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ARIZONA CORPORATION COMMISSION
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Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR AN ORDER OR ORDERS
AUTHORIZING IT TO ISSUE, INCUR AND
AMEND EVIDENCES OF LONG-TERM
INDEBTEDNESS AND OTHER LONG-TERM
SECURITIES, TO MANAGE INTEREST
RATE RISK, TO EXECUTE NEW SECURITY
INSTRUMENTS TO SECURE ANY SUCH
INDEBTEDNESS OR OTHER LONG-TERM
SECURITIES AND FOR DECLARATORY
ORDER CONCERNING VARIABLE
INTEREST ENTITIES

DOCKET NO. E-01345A-11-0423

**STAFF'S RESPONSE TO APS'
COMMENTS FOR AN INTERIM ORDER
TO EXTEND LONG TERM
AUTHORIZATION**

On November 19, 2012, APS filed comments concerning an extension of the long term debt authorizations contained in Decision No. 69947 (2007 Order). Commission Staff has reviewed APS' comments and believes such an extension is appropriate under the circumstances and good cause exists to extend the long term debt authorizations in the 2007 Order. Therefore, Staff supports an extension of the long term debt authorizations and further supports APS' suggested language "IT IS HEREBY ORDERED that the long-term debt authorizations of Decision No. 69947 shall remain in effect until further order of the Commission."

RESPECTFULLY SUBMITTED this 20th day of November 2012.

Maureen A. Scott, Senior Staff Counsel
Brian E. Smith, Attorney
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
(602) 542-3402

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1 Original and thirteen (13) copies
2 of the foregoing filed this
20th day of November 2012 with:

3 Docket Control
4 Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

5 Copy of the foregoing mailed this
6 20th day of November 2012 to:

7 Thomas L. Mumaw
8 Melissa Krueger
9 Pinnacle West Capital Corporation
400 North 5th Street, MS 8695
Phoenix, Arizona 85004
Attorneys for Arizona Public Service Company

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12 A handwritten signature in cursive script, appearing to read "Kaye Christine", is written over a horizontal line. The signature is positioned on line 12 of the document.

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