

WHEREFORE Staff recommends the Commission open a new case and move filings 13-21 to a new ACA case.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of May 2009.

/s/ Lera L. Shemwell