

ORIGINAL

OPEN MEETING



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MEMORANDUM
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2005 JUL 25 A 9:21

TO: THE COMMISSION

FROM: Utilities Division

AZ CORP COMMISSION
DOCUMENT CONTROL

DATE: July 25, 2005

RE: PLAN FOR ADMINISTRATION FOR THE POWER SUPPLY ADJUSTMENT - 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, AND FOR APPROVAL OF A PURCHASED POWER CONTRACT (DOCKET NO. E-01345A-03-0437)

On June 6, 2005, Staff filed, on behalf of the Settling Parties, a Plan for Administration for the Arizona Public Service Company ("APS") Power Supply Adjustment ("PSA") as required by Decision No. 67744. The proposed Plan for Administration ("Plan") describes the PSA and how calculations would be made, incorporating the PSA features included in the Settlement Agreement and the provisions of Decision No. 67744. The Plan also provides definitions and includes sample schedules.

Summary of PSA

The purpose of the PSA is to track changes in APS' cost of obtaining power supplies by comparing actual costs on a going forward basis to the base cost of \$0.020743 per kWh established by Decision No. 67744. The major features of the PSA are: (1) a 90% ratepayer/10% APS sharing mechanism, (2) the inclusion of off-system sales revenue, (3) the inclusion of fuel and purchased power costs, (4) an Adjustor Rate, (5) a bandwidth on changes in the Adjustor Rate of plus or minus \$0.004 per kWh over the life of the PSA, (6) a balancing account, (7) a surcharge mechanism, and (8) a limit of \$776,200,000 on annual power supply costs.

The results of the PSA are applied to customer bills through the Adjustor Rate. The Adjustor Rate, initially set at zero, will be reset on April 1st of each year. APS will provide a report to the Commission on March 1st of each year that shows the calculation of the new Adjustor Rate.

According to Paragraph 19e of the Settlement Agreement, if the size of the balancing account reaches plus or minus \$50 million, APS has 45 days to file a request for Commission approval of a surcharge or an explanation of why a surcharge is not necessary. Decision No. 67744 imposed a cap on the balancing account of \$100 million.

APS will file monthly reports to Staff and the Residential Utility Consumer Office detailing all calculations related to the PSA. APS will also file confidential monthly reports with Staff that provide details on generating units, power purchases, and fuel purchases.

Wheeling Costs and Broker Fees

Staff and APS have had discussions on whether to include wheeling costs and broker fees as allowable costs in the PSA. Staff recommends that wheeling costs be included, but that broker fees not be included.

Wheeling costs are costs for transmission service over lines not owned by APS. Included in the calculation of the base cost were \$13,975,000 in costs for wheeling power over lines owned by Western Area Power Administration, Salt River Project, and the U.S. Department of Energy. Staff believes that it is appropriate to include wheeling costs in the calculation of the PSA.

APS pays broker fees for executing transactions, including NYMEX deals. Broker fees were not included in the calculation of the base cost. However, broker fees were included in test year data. Therefore, customers are paying those costs through base rates. The amount of broker fees in the 2002 test year is not readily available because they were embedded in other costs. Broker fees were not accounted for separately until 2003. APS spent \$360,000 in 2003 and \$200,000 in 2004 for broker fees. Although broker fees may be legitimate for cost recovery, Staff does not believe that they should be recovered through the PSA. Since broker fees are not included in the \$0.020743 per kWh base cost established by Decision No. 67744 but are included in base rates, there could be double recovery if broker fees went through the PSA.

\$100 Million Cap

Decision No. 67744, page 17, lines 9-16, states, "Therefore, we will ... cap the balancing account to an aggregate amount of \$100 million. Should the Company seek to recover or refund a bank balance pursuant to Paragraph 19E of the Settlement Agreement, the timing and manner of recovery or refund of that existing bank balance will be addressed at such time. In no event shall the Company allow the bank balance to reach \$100 million prior to seeking recovery or refund. Following a proceeding to recover or refund a bank balance between \$50 million and \$100 million, the bank balance shall be reset to zero unless otherwise ordered by the Commission." After holding a number of discussions with APS on this matter, Staff believes that there was sufficient uncertainty regarding the details of how the \$100 million cap should be applied that this matter should be brought to the attention of the Commission.

The question is how the \$100 million cap relates to the treatment of the bank balance at the time of a filing by APS to address a bank balance which has exceeded \$50 million. Listed below are possible ways in which the \$100 million cap could be applied.

1. *\$100 million Cap With One-Time Surcharge* - One option is that after the bank balance reaches \$50 million but before it reaches \$100 million, APS files a request for a surcharge. The bank balance is then reset to zero permanently. Any additional costs are foregone. APS would only have one opportunity to file for a surcharge.
2. *\$100 Million as Hard Cap* - The \$100 million cap would continue to apply while the Commission processed APS' surcharge filing. If the \$100 million cap is reached while the Commission is processing the filing, APS would forego recovery of any amount exceeding the \$100 million cap. This approach would provide a clear method of applying the \$100 million cap and would ensure that the bank balance would not exceed \$100 million at any time. However, APS would have little or no ability to avoid having to forego an amount exceeding \$100 million due to the length of time it takes for the Commission to process a surcharge request. Also, there could be a quick increase in costs that pushes the bank balance over \$100 million even if the Commission processed the surcharge filing as quickly as possible.
3. *\$100 Million as Soft Cap* - The \$100 million cap would apply until such time as APS makes a surcharge filing with the Commission. After APS makes a filing to address the initial bank balance between \$50 million and \$100 million, the bank balance could exceed \$100 million until the Commission acts on the APS filing. After the Commission acts on the filing, APS could then make a new filing to address any subsequent bank balance which had built up to \$50 million or more. This approach would prevent APS from having to forego any amounts because of Commission processing time. However, this approach would allow for the possibility of a bank balance growing significantly beyond \$100 million.
4. *\$100 Million Cap Applies to Each APS Filing* - The \$100 million cap would apply each time APS makes a filing with the Commission to address a bank balance between \$50 million and \$100 million. After APS makes the filing, if new accumulations in the bank balance were between \$50 million and \$100 million, APS could make a second, separate filing to address that second bank balance. Subsequently, it is possible that additional filings could be made with the \$100 million cap being applied separately to the amount being addressed in each filing. In effect, the bank balance would be zeroed out at the time of the APS filing, with the amount of the bank balance at the time of the APS filing being treated separately.

Recognizing the uncertainty regarding the specific interpretation of the \$100 million cap provision, Staff's preferred option would be No. 4 (*\$100 Million Cap Applies to Each APS Filing*). This option provides an on-going application of the \$100 million cap in a manner which both requires APS to file to address its bank balance in a timely manner and provides APS the opportunity to address a circumstance where the balance may cumulatively exceed \$100 million

in a short time span. Specifically linking the \$100 million cap to the bank balance at the time of each filing also would reduce the opportunity in the future for confusion as to when the \$100 million cap applies.

Off-System Sales

Decision No. 67744 expressed concern that off-system sales could be made below cost and directed Staff to "establish a method that accurately reflects the appropriate fuel costs and revenue for off-system sales, so that the full margin is known and properly accounted for." In its monthly confidential reports to Staff, APS lists all off-system sales by buyer with associated revenue and costs. Staff intends to review these reports monthly and investigate further any off-system sale that is below cost.

Staff Recommendation of Plan

Staff recommends approval of the PSA Plan for Administration with Staff's recommendations regarding wheeling costs, broker fees, and the \$100 million cap. Staff also recommends that APS file a revised PSA Plan for Administration consistent with the Decision in this matter within 15 days of the effective date of the Decision.



Ernest G. Johnson
Director
Utilities Division

EGJ:BEK:lhmcCK

ORIGINATOR: Barbara Keene

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 JEFF HATCH-MILLER
Chairman

3 WILLIAM A. MUNDELL
Commissioner

4 MARC SPITZER
Commissioner

5 MIKE GLEASON
Commissioner

6 KRISTIN K. MAYES
Commissioner

7
8 PLAN FOR ADMINISTRATION FOR THE)
POWER SUPPLY ADJUSTMENT -)
9 APPLICATION OF ARIZONA PUBLIC)
SERVICE COMPANY FOR A HEARING TO)
10 DETERMINE THE FAIR VALUE OF THE)
UTILITY PROPERTY OF THE COMPANY)
11 FOR RATEMAKING PURPOSES, TO FIX A)
12 JUST AND REASONABLE RATE OF)
RETURN THEREON, TO APPROVE RATE)
13 SCHEDULES DESIGNED TO DEVELOP)
14 SUCH RETURN, AND FOR APPROVAL OF)
A PURCHASED POWER CONTRACT)

DOCKET NO. E-01345A-03-0437

DECISION NO. _____

ORDER

15
16 Open Meeting
August 9 and 10, 2005
17 Phoenix, Arizona

18
19 BY THE COMMISSION:

20 FINDINGS OF FACT

21 1. Arizona Public Service Company ("APS") is certificated to provide electric service
22 as a public service corporation in the State of Arizona.

23 2. On June 6, 2005, Staff filed, on behalf of the Settling Parties, a Plan for
24 Administration for the Arizona Public Service Company ("APS") Power Supply Adjustment
25 ("PSA") as required by Decision No. 67744. The proposed Plan for Administration ("Plan")
26 describes the PSA and how calculations would be made, incorporating the PSA features included
27 in the Settlement Agreement and the provisions of Decision No. 67744. The Plan also provides
28 definitions and includes sample schedules.

1 **Summary of PSA**

2 3. The purpose of the PSA is to track changes in APS' cost of obtaining power
3 supplies by comparing actual costs on a going forward basis to the base cost of \$0.020743 per
4 kWh established by Decision No. 67744. The major features of the PSA are: (1) a 90%
5 ratepayer/10% APS sharing mechanism, (2) the inclusion of off-system sales revenue, (3) the
6 inclusion of fuel and purchased power costs, (4) an Adjustor Rate, (5) a bandwidth on changes in
7 the Adjustor Rate of plus or minus \$0.004 per kWh over the life of the PSA, (6) a balancing
8 account, (7) a surcharge mechanism, and (8) a limit of \$776,200,000 on annual power supply
9 costs.

10 4. The results of the PSA are applied to customer bills through the Adjustor Rate. The
11 Adjustor Rate, initially set at zero, will be reset on April 1st of each year. APS will provide a
12 report to the Commission on March 1st of each year that shows the calculation of the new Adjustor
13 Rate.

14 5. According to Paragraph 19e of the Settlement Agreement, if the size of the
15 balancing account reaches plus or minus \$50 million, APS has 45 days to file a request for
16 Commission approval of a surcharge or an explanation of why a surcharge is not necessary.
17 Decision No. 67744 imposed a cap on the balancing account of \$100 million.

18 6. APS will file monthly reports to Staff and the Residential Utility Consumer Office
19 detailing all calculations related to the PSA. APS will also file confidential monthly reports with
20 Staff that provide details on generating units, power purchases, and fuel purchases.

21 **Wheeling Costs and Broker Fees**

22 7. Staff and APS have had discussions on whether to include wheeling costs and
23 broker fees as allowable costs in the PSA. Staff recommends that wheeling costs be included, but
24 that broker fees not be included.

25 8. Wheeling costs are costs for transmission service over lines not owned by APS.
26 Included in the calculation of the base cost were \$13,975,000 in costs for wheeling power over
27 lines owned by Western Area Power Administration, Salt River Project, and the U.S. Department
28 . . .

1 of Energy. Staff believes that it is appropriate to include wheeling costs in the calculation of the
2 PSA.

3 9. APS pays broker fees for executing transactions, including NYMEX deals. Broker
4 fees were not included in the calculation of the base cost. However, broker fees were included in
5 test year data. Therefore, customers are paying those costs through base rates. The amount of
6 broker fees in the 2002 test year is not readily available because they were embedded in other
7 costs. Broker fees were not accounted for separately until 2003. APS spent \$360,000 in 2003 and
8 \$200,000 in 2004 for broker fees. Although broker fees may be legitimate for cost recovery, Staff
9 does not believe that they should be recovered through the PSA. Since broker fees are not
10 included in the \$0.020743 per kWh base cost established by Decision No. 67744 but are included
11 in base rates, there could be double recovery if broker fees went through the PSA.

12 **\$100 Million Cap**

13 10. Decision No. 67744, page 17, lines 9-16, states, "Therefore, we will ... cap the
14 balancing account to an aggregate amount of \$100 million. Should the Company seek to recover
15 or refund a bank balance pursuant to Paragraph 19E of the Settlement Agreement, the timing and
16 manner of recovery or refund of that existing bank balance will be addressed at such time. In no
17 event shall the Company allow the bank balance to reach \$100 million prior to seeking recovery or
18 refund. Following a proceeding to recover or refund a bank balance between \$50 million and \$100
19 million, the bank balance shall be reset to zero unless otherwise ordered by the Commission."
20 After holding a number of discussions with APS on this matter, Staff believes that there was
21 sufficient uncertainty regarding the details of how the \$100 million cap should be applied that this
22 matter should be brought to the attention of the Commission.

23 11. The question is how the \$100 million cap relates to the treatment of the bank
24 balance at the time of a filing by APS to address a bank balance which has exceeded \$50 million.
25 Listed below are possible ways in which the \$100 million cap could be applied.

- 26 a. *\$100 million Cap With One-Time Surcharge* - One option is that after the bank
27 balance reaches \$50 million but before it reaches \$100 million, APS files a request
28 for a surcharge. The bank balance is then reset to zero permanently. Any
additional costs are foregone. APS would only have one opportunity to file for a
surcharge.

1 b. *\$100 Million as Hard Cap* - The \$100 million cap would continue to apply while
2 the Commission processed APS' surcharge filing. If the \$100 million cap is
3 reached while the Commission is processing the filing, APS would forego recovery
4 of any amount exceeding the \$100 million cap. This approach would provide a
5 clear method of applying the \$100 million cap and would ensure that the bank
6 balance would not exceed \$100 million at any time. However, APS would have
7 little or no ability to avoid having to forego an amount exceeding \$100 million due
8 to the length of time it takes for the Commission to process a surcharge request.
9 Also, there could be a quick increase in costs that pushes the bank balance over
10 \$100 million even if the Commission processed the surcharge filing as quickly as
11 possible.

12 c. *\$100 Million as Soft Cap* - The \$100 million cap would apply until such time as
13 APS makes a surcharge filing with the Commission. After APS makes a filing to
14 address the initial bank balance between \$50 million and \$100 million, the bank
15 balance could exceed \$100 million until the Commission acts on the APS filing.
16 After the Commission acts on the filing, APS could then make a new filing to
17 address any subsequent bank balance which had built up to \$50 million or more.
18 This approach would prevent APS from having to forego any amounts because of
19 Commission processing time. However, this approach would allow for the
20 possibility of a bank balance growing significantly beyond \$100 million.

21 d. *\$100 Million Cap Applies to Each APS Filing* - The \$100 million cap would apply
22 each time APS makes a filing with the Commission to address a bank balance
23 between \$50 million and \$100 million. After APS makes the filing, if new
24 accumulations in the bank balance were between \$50 million and \$100 million,
25 APS could make a second, separate filing to address that second bank balance.
26 Subsequently, it is possible that additional filings could be made with the \$100
27 million cap being applied separately to the amount being addressed in each filing.
28 In effect, the bank balance would be zeroed out at the time of the APS filing, with
29 the amount of the bank balance at the time of the APS filing being treated
30 separately.

31 12. Recognizing the uncertainty regarding the specific interpretation of the \$100
32 million cap provision, Staff's preferred option would be No. 4 (*\$100 Million Cap Applies to Each
33 APS Filing*). This option provides an on-going application of the \$100 million cap in a manner
34 which both requires APS to file to address its bank balance in a timely manner and provides APS
35 the opportunity to address a circumstance where the balance may cumulatively exceed \$100
36 million in a short time span. Specifically linking the \$100 million cap to the bank balance at the
37 time of each filing also would reduce the opportunity in the future for confusion as to when the
38 \$100 million cap applies.

39 ...

1 Off-System Sales

2 13. Decision No. 67744 expressed concern that off-system sales could be made below
3 cost and directed Staff to "establish a method that accurately reflects the appropriate fuel costs and
4 revenue for off-system sales, so that the full margin is known and properly accounted for." In its
5 monthly confidential reports to Staff, APS lists all off-system sales by buyer with associated
6 revenue and costs. Staff intends to review these reports monthly and investigate further any off-
7 system sale that is below cost.

8 Staff Recommendation of Plan

9 14. Staff recommends approval of the PSA Plan for Administration with Staff's
10 recommendations regarding wheeling costs, broker fees, and the \$100 million cap. Staff also
11 recommends that APS file a revised PSA Plan for Administration consistent with the Decision in
12 this matter within 15 days of the effective date of the Decision.

13 CONCLUSIONS OF LAW

14 1. APS is an Arizona public service corporation within the meaning of Article XV,
15 Section 2, of the Arizona Constitution.

16 2. The Commission has jurisdiction over APS and over the subject matter of the
17 application.

18 3. The Commission, having reviewed the application and Staff's Memorandum dated
19 July 25, 2005, concludes that it is in the public interest to approve the Plan for Administration,
20 with Staff's recommendations.

21 ORDER

22 THEREFORE, IT IS ORDERED that the Plan for Administration for the Power Supply
23 Adjustment, with Staff's recommendations regarding wheeling costs, broker fees, and the \$100
24 million cap, be and hereby is approved.

25 ...
26 ...
27 ...
28 ...

1 IT IS FURTHER ORDERED that APS file a revised PSA Plan for Administration
2 consistent with the terms of this Decision within 15 days from the effective date of the Decision.

3 IT IS FURTHER ORDERED that this Decision shall become effective immediately.
4

5 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**
6

7
8 CHAIRMAN

COMMISSIONER

9
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11 COMMISSIONER

COMMISSIONER

COMMISSIONER

12 IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive
13 Secretary of the Arizona Corporation Commission, have
14 hereunto, set my hand and caused the official seal of this
15 Commission to be affixed at the Capitol, in the City of
16 Phoenix, this _____ day of _____, 2005.

17
18 _____
19 BRIAN C. McNEIL
20 Executive Secretary

21
22 DISSENT: _____

DISSENT: _____

23 EGJ:BEK:ihm\CCK
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1 SERVICE LIST FOR: Arizona Public Service Company
2 DOCKET NOS. E-01345A-03-0437
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