



RECEIVED

ORIGINAL

2005 OCT 13 A 11: 21

BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION
DOCUMENT CONTROL

COMMISSIONERS

- JEFF HATCH-MILLER, Chairman
- WILLIAM A. MUNDELL
- MARC SPITZER
- MIKE GLEASON
- KRISTIN K. MAYES

IN THE MATTER OF THE APPLICATION OF THE
 ARIZONA ELECTRIC POWER COOPERATIVE,
 INC. FOR AN ORDER EXTENDING THE TIME TO
 FILE ITS AMENDED EPS PLAN.

DOCKET NO. E-01773A-05-0723

APPLICATION

The Arizona Electric Power Cooperative, Inc. ("AEPCO"), on behalf of itself and its five Arizona member distribution cooperatives, requests that the Commission enter its Order extending the filing of its Amended EPS Plan to a date 120 days after the adoption of the revised EPS Rule. In support of its Application, AEPCO states as follows:

1. AEPCO is a non-profit, electric generation cooperative which supplies all or most of the power delivered at retail by its member distribution cooperatives. AEPCO's all-requirements Arizona members are the Duncan Valley Electric Cooperative, Graham County Electric Cooperative, Sulphur Springs Valley Electric Cooperative and Trico Electric Cooperative. Its partial-requirements member is the Mohave Electric Cooperative (collectively, the "Distribution Cooperatives").

2. On February 8, 2001, the Commission adopted the Environmental Portfolio Standard Rules ("EPS Rules"), the current version of which is codified at A.A.C. R14-2-1618. AEPCO and several other parties filed applications for rehearing of the EPS Rules and on March 29, 2001, the Commission, after granting rehearing, entered Decision No. 63846 ("Rehearing Decision").

GALLAGHER & KENNEDY, P.A.
 2575 E. CAMELBACK ROAD
 PHOENIX, ARIZONA 85016-9225
 (602) 530-8000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

1 3. The Rehearing Decision temporarily exempted nonprofit, member-owned
2 cooperatives such as AEPCO and its Distribution Cooperatives from EPS Rules' compliance. It
3 also authorized AEPCO and its Distribution Cooperatives to file an EPS Plan, which filing
4 would extend the EPS Rules' exemption until the Commission acted on the Plan. As the power
5 supplier for its Distribution Cooperatives, AEPCO timely filed its EPS Plan on October 31,
6 2001. As amended, it uses surcharge funds and additional voluntary contributions for (i) rebates
7 of up to \$4.00 per watt to encourage the installation of distributed on-site residential and business
8 renewable systems and (ii) installation of larger-scale renewable systems either by AEPCO itself
9 or by or in combination with others.

10 4. Following several meetings with Staff and certain amendments and supplemental
11 requests in relation to the EPS Plan, on August 10, 2004, the Commission issued Decision
12 No. 67176 (the "Decision"). For convenience, a copy of the Decision is attached as Exhibit A.
13 As relevant here, the Decision approved the EPS Plan, finding it consistent with EPS Rules'
14 requirements, but instructed AEPCO to submit a revised EPS Plan by December 31, 2005 taking
15 into account, among other things, "consideration of any changes to the EPS Rules approved by
16 the Commission in 2004..." (Decision, Finding 35, p. 7). The Decision also granted AEPCO
17 leave to renew its request to limit the Distribution Cooperatives' renewable percentage
18 requirements to those amounts derived from the EPS Plan (Decision, First Ordering Paragraph,
19 p. 8). AEPCO and its Distribution Cooperatives have proceeded to implement the EPS Plan. In
20 its first year of operation, it has helped finance the installation of more than 200 distributed
21 renewable installations at the retail member level.

22 5. When the Decision was issued in August, 2004, it was expected that the
23 Commission would approve revisions to the EPS Rules by early this year which would have
24

1 allowed AEPCO to prepare and file an amended EPS Plan by December 31. Formulating rules
2 revisions, however, has taken longer than expected and is still underway. Once the Commission
3 decides on amendments, Administrative Procedure Act notice, public comment and adoption
4 procedures make it likely that the revised EPS Rules will not be adopted before the second
5 quarter of next year.

6 6. In light of this, AEPCO would request that the Commission enter its Order
7 extending the due date for filing its amended EPS Plan until 120 days after revised EPS Rule
8 adoption and also continue its finding that the current plan is consistent with the current and
9 revised EPS Rules' requirements until the Commission has acted on the amended EPS Plan.
10 This will allow AEPCO and its Distribution Cooperatives sufficient time to consider the changes
11 to the Rules as well as the other factors specified in the Decision and make a comprehensive
12 filing.

13 Having fully stated its Application, AEPCO requests that the Commission enter its Order:

14 1. Extending the due date for filing its Amended EPS Plan until 120 days after the
15 revised EPS Rules are formally adopted, and

16 2. Continuing its finding that the EPS Plan approved in Decision No. 67176 is
17 consistent with the requirements of the current EPS Rules and as they may be revised until the
18 Commission acts on the amended EPS Plan filing and any associated requests.

19

20

21

22

23

24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

DATED this 13th day of October, 2005.

GALLAGHER & KENNEDY, P.A.

By Michael M. Grant

Michael M. Grant
Todd C. Wiley
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for Arizona Electric Power
Cooperative, Inc.

Original and thirteen copies filed this
13th day of October, 2005, with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Dei Deasall

10421-40/1303582

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
WILLIAM A. MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

Arizona Corporation Commission

DOCKETED

AUG 10 2004

DOCKETED BY NR



IN THE MATTER OF THE APPLICATION)
OF THE ARIZONA ELECTRIC POWER)
COOPERATIVE, INC. FOR APPROVAL OF)
ITS EPS PLAN AND CERTAIN WAIVERS)
OF R14-2-1618)

DOCKET NO. E-01773A-01-0868

DECISION NO. 67176

ORDER

Open Meeting
August 3 and 4, 2004
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On February 8, 2001, the Arizona Corporation Commission ("Commission") entered Decision No. 63364, which adopted the Environmental Portfolio Standard ("EPS" or "Portfolio") Rules, A.A.C. R14-2-1618. Five parties to the docket filed applications for rehearing and reconsideration of the decision.

2. On March 29, 2001, the Commission entered Decision No. 63486 ("Decision" or "Order"), which modified the EPS Rules and which included exemptions to the rules in response to some of the applications for rehearing and reconsideration.

3. The Commission exempted nonprofit, member-owned cooperatives from compliance with the EPS Rules for a period of 180 days. The Decision further allowed the cooperatives, at their own option, to commence collecting the Environmental Portfolio Surcharge.

4. The Commission ordered the cooperatives to file a plan for meeting the Portfolio requirements for Commission consideration on or before the end of the 180-day exemption period

1 expiration. The Order further stated that the timely filing of the plan or request for an extension
2 would extend the exemption period until the Commission considers and acts upon the plan or
3 request. The decision further ordered the exempt cooperatives to meet with both the Utilities
4 Division Staff ("Staff") and representatives of the Rural Utilities Service ("RUS") and other
5 appropriate federal agencies in an effort to work toward reaching mutual goals within the context
6 of the EPS Rules.

7 5. On October 31, 2001, Arizona Electric Power Cooperative, Inc. ("AEPCO") filed
8 its proposed EPS Plan and its request for waivers related to reporting requirements of the EPS
9 Rules and informational filing requirements of the member distribution cooperatives. The
10 Commission has not taken any action on the original AEPCO application.

11 6. Staff and representatives of AEPCO met to discuss the application, AEPCO's EPS
12 requirements analysis, and possible projects in the EPS Plan on at least two occasions and
13 discussed aspects of the application on the telephone on numerous occasions.

14 7. On January 12, 2004, AEPCO filed an amended application. In the amended
15 application, AEPCO made minor modifications to the AEPCO EPS Plan, which included the
16 deletion of the proposed SunWatts Leasing Program and also included a doubling of the total
17 rebates available to customers in the SunWatts Incentive Program.

18 8. On March 30, 2004, AEPCO contacted Staff about a proposed joint renewable
19 energy project with the City of Tucson that could meet a portion of the Portfolio requirements of
20 AEPCO's member distribution cooperatives.

21 9. On April 6, 2004, AEPCO filed a Supplemental Request for Relief in relation to its
22 Amended Application which requested that the Commission authorize a process for Staff pre-
23 approval of certain projects and programs associated with AEPCO's Amended SunWatts Plan

24 10. AEPCO requested, in its application, waivers of three requirements. AEPCO
25 requested limitation of AEPCO's and its member distribution cooperatives' required retail
26 renewable energy delivery requirements (in R14-2-1618. A & B) to those amounts derived from
27 the EPS Plan. AEPCO requested waiver of the member distribution cooperatives' reporting
28 requirements (in R14-2-1618. D) and the substitution of the reporting requirements set forth in the

1 EPS Plan. AEPCO requested waiver of the informational filing requirements included in the
2 Commission orders that approved the individual member distribution cooperatives' EPS surcharge
3 tariffs. The filings are required to "provide sufficient information for a fair value determination."
4 AEPCO requests that the Commission relieve the members of this requirement and allow AEPCO
5 instead to supply the requested information.

6 11. Staff recommends that the Commission deny the AEPCO request to limit the
7 Portfolio requirements to those amounts derived from its EPS Plan. Staff believes that it is too
8 soon to determine whether AEPCO will or will not be able to meet its Portfolio requirements over
9 the next 10 years. Staff recommends that the Commission consider AEPCO's request for
10 limitation of its members' Portfolio requirements in 2006 or 2007 and base its decision on
11 AEPCO's actual experience in 2004, 2005, and 2006. .

12 12. Staff recommends that AEPCO be allowed to submit the annual reports for the
13 distribution cooperatives that are required in R14-2-1618. D, but that AEPCO must file them with
14 the same information and at the same time each year as all other utilities: April 15. In AEPCO's
15 filing of information for its member distribution cooperatives, AEPCO shall separately identify the
16 annual retail electric sales of each member distribution cooperative, the resulting EPS requirement,
17 the portion of AEPCO's Portfolio generation that is allocated to each member cooperative's
18 Portfolio requirement, and if there is a Portfolio shortfall, how that shortfall is allocated among the
19 various member distribution cooperatives. In its exceptions, AEPCO recommended that its
20 reporting be done on an aggregated instead of an individual member cooperative basis, because for
21 these purposes its system and, therefore, the requirements of the EPS Rules should be applied to
22 the total system. The Commission agrees. In the annual reports, AEPCO shall identify the total
23 annual retail electric sales of all of its Arizona Class A member cooperatives, the resulting EPS
24 requirement and the quantification of the Portfolio shortfall, if any.

25 13. Staff recommends that AEPCO's proposal to report "fair value information" on
26 behalf of its member distribution cooperatives be denied. It is the distribution utility's
27 responsibility to file this information because the tariffs are the distribution utilities' tariffs. The
28 tariffs are currently interim, and the information is needed to determine whether the tariffs can be

1 made permanent. The distribution utilities have the requested information about their businesses;
2 AEPCO would not have the information. AEPCO would not file a rate case on behalf of one of its
3 members. Staff recommends that the Commission set the compliance date for the fair value
4 information filing in the member cooperatives' EPS surcharge tariff orders to a date of June 30,
5 2005.

6 14. In its application, AEPCO claims that under current Rural Utilities Service ("RUS")
7 rules AEPCO would not be able to borrow funds to meet the EPS requirement.

8 15. Staff disagrees with AEPCO's interpretation and Staff recommends that AEPCO
9 invite RUS officials to visit Arizona to meet jointly with Staff, AEPCO and other interested parties
10 to explore ways that RUS might help facilitate the provision of loans or loan guarantees to AEPCO
11 in order to meet its Portfolio requirements. Another alternative would be to have a joint
12 teleconference call with Staff, AEPCO and RUS officials included in the call.

13 16. The fundamental concept of AEPCO's EPS Plan is to use surcharge funds and
14 voluntary contributions that are collected by the distribution cooperatives to fund the development
15 of renewable generation facilities by either AEPCO or its retail member-customers. The Plan does
16 not contemplate either the purchase of renewable kWhs from third parties or the purchase of
17 eligible renewable credits from others. The AEPCO Plan includes three major parts, also known
18 as SunWatts.

19 17. The "SunWatts Contribution Program" is similar to the "green pricing" programs of
20 other Arizona utilities. Under the program, the customers would donate amounts ranging from
21 \$2.00 to \$10.00 each month. The amount would be on the retail customer's bill from the local
22 cooperative. Amounts collected would be forwarded to AEPCO to be added to the proceeds of the
23 EPS Surcharge. The funds would be used by AEPCO to purchase and install renewable generation
24 resources.

25 18. The "SunWatts Incentive Program" is a rebate program for member/customers of
26 Arizona Class A member cooperatives that install a photovoltaic system. In the original
27 application, AEPCO offered \$1.00 per Watt, for up to 2,000 Watts on an installed residential
28 system. AEPCO also offered \$1.00 per Watt, for up to 5,000 Watts for a commercial system. In

1 its January 2004 amended application, AEPCO increased its rebate/incentive to \$2.00 per Watt for
2 the same sized systems. The systems would have to meet AEPCO's program requirements and
3 would be inspected by the distribution cooperative employees. AEPCO sets aside a total of
4 \$100,000 per year for this program.

5 19. The "SunWatts Large-Scale Generating Program" is a major component of the
6 SunWatts program. In this program AEPCO would install and operate a utility-scale renewable
7 generating system. AEPCO could install such projects by itself, but will also seek to find one or
8 more partners who can contribute funding, expertise, services, or in-kind facilities.

9 20. AEPCO proposes to report its progress to the Commission annually starting on
10 June 30, 2005. AEPCO indicates that it will use no more than 5 percent of the total funds for
11 administrative expenditures. It further promises not to use more than 5 percent of the total funds
12 for advertising and promotion of the SunWatts program. Finally, AEPCO says it will not use more
13 than 5 percent of the total funds for research, development, or educational activities.

14 21. The Thorneydale Project is a proposed joint renewable energy project to be
15 constructed by AEPCO and the City of Tucson. On March 30, 2004, AEPCO notified Staff about
16 the proposed project and sent Staff detailed information about the project. The project would
17 include the installation of 22 kW of photovoltaic panels at a City of Tucson pumping station,
18 within the service territory of Trico Electric Cooperative. AEPCO would pay for up to \$50,000 in
19 project costs, which would translate to about \$2,200 per kW (DC-rated).

20 22. On April 6, 2004, AEPCO filed a Supplemental Request for Relief in relation to its
21 Amended Application which requested that the Commission authorize a process for Staff pre-
22 approval of certain projects and programs associated with AEPCO's Amended SunWatts Plan.
23 The intent of the request was to allow AEPCO flexibility to adjust to any possible changes in the
24 EPS Rules in 2004 or 2005 and to allow for new ideas or programs that do not fit into the three
25 original programs outlined in the Amended AEPCO EPS Plan.

26 23. Staff has reviewed the AEPCO EPS Plan and has a number of recommendations
27 related to details in the Plan.

28 ...

1 24. Staff recommends that AEPCO reconsider its decision to avoid purchases from
2 third-party generators. There may be opportunities in the future for AEPCO to purchase low-cost
3 renewable kWhs from third parties. Staff recommends that AEPCO consider the potential of
4 signing long-term power purchase contracts of Portfolio resources as one way to meet a portion of
5 member cooperatives' Portfolio requirements.

6 25. Staff recommends that AEPCO consider adopting a formal "Green Pricing"
7 program similar to those of other Arizona utilities. Such a program would provide an extra .5
8 multiplier toward AEPCO meeting its member distribution cooperatives' EPS requirements. This
9 would require each of the participating member cooperatives to file "Green Pricing" tariffs.

10 26. Staff recommends that the Commission authorize AEPCO to offer, at its own
11 discretion, incentives up to \$4.00 per Watt in order to attract joint customer projects.

12 27. Staff believes that the SunWatts Incentive Program can greatly encourage the
13 development of distributed generation within the service territories of AEPCO's member
14 distribution cooperatives. Staff asserts that the economics of remote solar, wind, or hybrid projects
15 are generally much better in rural locations than in urban settings.

16 28. Staff believes that the AEPCO limit for the SunWatts Incentive Program funding
17 level of \$100,000 per year is too low. Staff believes that, if the rebate is increased to \$4 per Watt,
18 the demand for incentives may well outstrip the funding available. Therefore, Staff recommends
19 that the Commission allow AEPCO to spend up to one-half of all surcharge funds collected in a
20 year on the SunWatts Incentive Program.

21 29. Staff is aware that, on February 6, 2004, the Arizona Solar Energy Industries
22 Association docketed a "Proposal for a Uniform EPS Credit Purchase Program." If, in the future,
23 the Commission should choose to adopt such a program, Staff recommends that the Commission
24 authorize AEPCO to participate in such a program, without any additional approvals, even though
25 the program may be significantly different than the SunWatts Incentive Program which is included
26 in the amended AEPCO EPS Plan.

27 30. In Staff's review of the Thorneydale Project, Staff has determined that AEPCO's
28 participation in the project would help meet a portion of its member distribution cooperatives' EPS

1 requirements. Staff believes that the leveraging of funds by utilities in joint projects such as this is
2 an excellent way to meet Portfolio requirements. Staff believes that AEPCO should be encouraged
3 to search for other, similar joint project opportunities. Staff recommends that the Commission
4 approve the Thorneydale Project as a part of the AEPCO EPS Plan.

5 31. Staff contends that AEPCO's request for Commission authorization of a Staff pre-
6 approval process for projects and programs that are outside the parameters of the AEPCO EPS
7 Plan is a reasonable request, in the short run, until AEPCO is able to modify its plan in the future.
8 Staff recommends that the Commission approve the establishment of such a pre-approval process,
9 but on a limited time basis only, extending one year from the Commission approval of this
10 AEPCO application.

11 32. Staff mentioned the possibility that the Portfolio Standard may change in 2004.
12 Starting on January 6, 2004, the Commission directed Staff to commence a workshop process to
13 consider a limited number of possible changes to the EPS Rules. There is a possibility, after the
14 completion of the EPS Change Workshop process, that the Commission may choose to incorporate
15 some of the suggested changes into a new amended set of EPS rules.

16 33. Facing the possibility that the EPS rules could change within the next year, Staff
17 believes that the AEPCO EPS Plan is a good start, but that any Commission approval should be
18 limited to a nominal one-year period after approval by the Commission.

19 34. Staff recommends that the Commission declare the AEPCO EPS Plan as consistent
20 with the requirements of the EPS Rules and approve the AEPCO EPS Plan as a limited, nominal
21 one-year plan, to be revised in 2005, with certain changes, allowing AEPCO to offer incentives up
22 to \$4 per Watt in its SunWatts Incentive Program and to utilize up to one-half of the Portfolio
23 surcharge funds collected in any given year to support the SunWatts Incentive Program.

24 35. Staff recommends that the Commission require AEPCO to submit a revised EPS
25 Plan by April 1, 2005, that includes consideration of any changes to the EPS rules approved by the
26 Commission in 2004, the potential for RUS financing, plans for an RFP or bidding process to
27 purchase a portion of the distribution cooperatives' Portfolio electricity requirements (either kWh
28 or credits) from third-party generators, and possible revisions, if appropriate, to the SunWatts

1 Incentive Program, based upon experience in 2004 and early 2005. In its exceptions, AEPCO
2 requested that it be allowed to file its revised EPS Plan by December 31, 2005 which would allow
3 it more time to evaluate current EPS Plan effectiveness as well as any changes to the EPS Rules
4 which we may adopt. The Commission agrees that the filing date should be December 31, 2005.

5 CONCLUSIONS OF LAW

6 1. AEPCO and its member cooperatives are Arizona public service corporations
7 within the meaning of Article XV, Section 2, of the Arizona Constitution.

8 2. The Commission has jurisdiction over AEPCO and its member cooperatives and
9 over the subject matter of this application.

10 3. The Commission, having reviewed the application and Staff's Memorandum dated
11 April 29, 2004, concludes that it is in the public interest to approve part of the application and to
12 deny part of the application.

13 ORDER

14 IT IS THEREFORE ORDERED that AEPCO's request to limit the Portfolio requirements
15 of AEPCO and its member distribution cooperatives to those amounts derived from AEPCO's EPS
16 Plan is denied with leave to re-submit such request in its revised Plan filing ordered herein.

17 IT IS FURTHER ORDERED that AEPCO's request to be allowed to submit the annual
18 reports for the distribution cooperatives that are required in R14-2-1618. D is approved. The
19 applicant shall file the reports as described in Finding of Fact No. 12.

20 IT IS FURTHER ORDERED that AEPCO's request that AEPCO be allowed to file the fair
21 value information filings of its member cooperatives as required in the Commission orders
22 approving the EPS surcharge tariffs is denied.

23 IT IS FURTHER ORDERED that AEPCO shall invite RUS officials to visit Arizona to
24 meet jointly with Staff, AEPCO and other interested parties or participate in a joint teleconference
25 call to explore ways that RUS might help facilitate the provision of loans or loan guarantees to
26 AEPCO in order to meet the Portfolio requirements of AEPCO's member cooperatives.

27 ...

28 ...

1 IT IS FURTHER ORDERED that the AEPCO EPS Plan is consistent with the
2 requirements of the EPS Rules for AEPCO and its Arizona Class A member distribution
3 cooperatives.

4 IT IS FURTHER ORDERED that AEPCO's Arizona Class A member distribution
5 cooperatives are authorized to collect the EPS surcharge and remit the proceeds to AEPCO for
6 expenditures consistent with the approved EPS Plan and this Order.

7 IT IS FURTHER ORDERED that the AEPCO EPS Plan is approved as a limited plan
8 pending this Commission's review and action on AEPCO's revised Plan ordered herein.

9 IT IS FURTHER ORDERED that AEPCO is allowed to offer incentives up to \$4 per Watt
10 in its SunWatts Incentive Program in order to encourage customer partnerships in joint projects.

11 IT IS FURTHER ORDERED that AEPCO is allowed to utilize up to one-half of the
12 Portfolio surcharge funds collected in any given year to support the SunWatts Incentive Program.

13 IT IS FURTHER ORDERED that AEPCO shall submit a revised EPS Plan by
14 December 31, 2005, that includes items as described in Finding of Fact No. 35.

15 IT IS FURTHER ORDERED that AEPCO's request for the establishment of a Staff pre-
16 approval process for projects and programs that are outside the parameters of the AEPCO EPS
17 Plan, is approved, on a limited time basis only, extending one year from the date of the
18 Commission order in this matter.

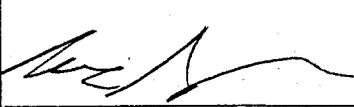
19 IT IS FURTHER ORDERED that if, in the future, the Commission should choose to adopt
20 a uniform EPS credit program, AEPCO shall be authorized to participate in such a program,
21 without any additional approvals, even though the program may be significantly different than the
22 SunWatts Incentive Program which is included in the amended AEPCO EPS Plan.

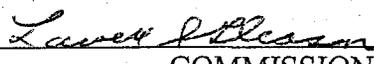
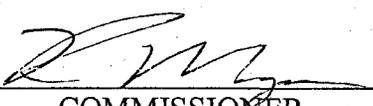
23 ...
24 ...
25 ...
26 ...
27 ...
28 ...

1 IT IS FURTHER ORDERED that the Thorneydale Project is approved as part of the
2 AEPCO EPS Plan.

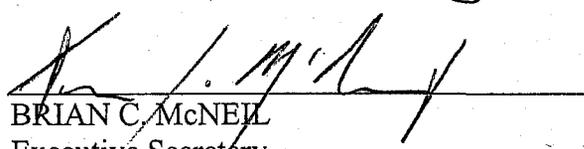
3 IT IS FURTHER ORDERED that this decision shall become effective immediately.

4 BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

5   
6 CHAIRMAN COMMISSIONER COMMISSIONER

7
8  
9 COMMISSIONER COMMISSIONER

10 IN WITNESS WHEREOF, I BRIAN C. McNEIL, Executive
11 Secretary of the Arizona Corporation Commission, have
12 hereunto, set my hand and caused the official seal of this
13 Commission to be affixed at the Capitol, in the City of
Phoenix, this 10th day of August, 2004.

14 
15 BRIAN C. McNEIL
16 Executive Secretary

17 DISSENT: _____

18
19 DISSENT: _____

20 EGJ:RTW:ihm\JMA

1 SERVICE LIST FOR: Arizona Electric Power Cooperative, Inc.
2 DOCKET NO. E-01773A-01-0868

3 Mr. Michael M. Grant
4 Gallagher & Kennedy, P.A.
5 2575 East Camelback Road
6 Phoenix, Arizona 85016-9225

7 Mr. Ernest G. Johnson
8 Director, Utilities Division
9 Arizona Corporation Commission
10 1200 West Washington
11 Phoenix, Arizona 85007

12 Mr. Christopher C. Kempley
13 Chief Counsel
14 Arizona Corporation Commission
15 1200 West Washington
16 Phoenix, Arizona 85007

17
18
19
20
21
22
23
24
25
26
27
28