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**BEFORE THE ARIZONA CORPORATION COMMISSION**

**COMMISSIONERS**

KRISTIN K. MAYES, Chairman  
GARY PIERCE  
PAUL NEWMAN  
SANDRA D. KENNEDY  
BOB STUMP

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-08-0172

INITIAL CLOSING BRIEF

October 9, 2009

Arizonans throughout the APS (the Company) service territory and the state, continue to struggle to make ends meet, and of more concern in this case, to pay their utility bills. The parties in this case have agreed that circumstances are such that in order to support the Company's health, and at the same time ensure that low-income families realize reasonable rates, are subject to fair practices and procedures, and that additional support is available to families in order to ensure consistent and *continued electric service*, have reached the agreement that is before the Commission.

The provisions in this case that all settling parties have agreed to include: holding low-income customers harmless within the E-3 and E-4 rates; maintaining the 150% eligibility for these rates, and at the same time creating a new program funded by the Company to provide assistance to families whose incomes fall between 150-200% of the federal poverty level; and the waiver of the collection of an additional security deposit from customers enrolled in the low-income discount programs provided the customer has had more than two late payments in the previous 12 months or the customer has been disconnected for non-payment.

I support the specific items that address the very real needs of the low-income community and the full settlement agreement that is before the Commission and ask the members of the Commission to support the agreement as well.

RESPECTFULLY SUBMITTED this October 9, 2009

By   
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Original and 13 copies hand delivered October 9, 2009 to:  
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