

ORIGINAL

OPEN MEETING



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MEMORANDUM

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Arizona Corporation Commission

TO: THE COMMISSION

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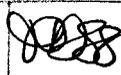
2010 NOV -9 P 12: 48

FROM: Utilities Division

NOV - 9 2010

AZ CORP COMMISSION
DOCKET CONTROL

DATE: November 9, 2010

DOCKETED BY 

RE: ARIZONA PUBLIC SERVICE COMPANY'S APPLICATION FOR APPROVAL OF PLANS RELATED TO RENEWABLE TRANSMISSION PROJECTS (DOCKET NO. E-01345A-10-0033)

As part of the Fifth Biennial Transmission Assessment ("BTA") Process, Arizona electric utilities were required to file, by October 2009, a document identifying their top potential Renewable Transmission Projects ("RTPs") that would support the growth of renewable resources in Arizona.¹ On October 30, 2009, Arizona Public Service Company ("APS" or "Company") filed its top potential RTPs in APS' service territory. That filing included a proposed development approach and schedule. A key part of the Company's October 2009 filing was its Renewable Transmission Action Plan ("RTAP") which was developed in cooperation with other utilities and interested stakeholders. The intent of the RTAP is to create a method for RTP identification, approval and financing. APS emphasizes in its RTAP that cost recovery for the RTPs is critical to the viability of the projects.

On January 29, 2010, APS filed "The Application of Arizona Public Service Company for Approval of Plans Related to Renewable Transmission Projects." Included were descriptions of APS' "top three" RTPs and the APS Renewable Transmission Action Plan. In the application, APS requested that the Commission determine the following:

1. The proposed process to identify RTPs is appropriate.
2. The proposed RTAP is appropriate.
3. The proposed timing of the next RTAP filing should be in parallel with the 2012 BTA process.
4. The proposed flexibility with the timing and duration of the Certificates of Environmental Compatibility ("CECs") acquired for RTPs is appropriate.
5. The proposed Delay to Palo Verde 500 kV line is in the public interest and this RTP and APS' RTAP development plan for the project are therefore approved.

¹ Decision No 70635, dated December 11, 2008.

6. The proposed Palo Verde to North Gila 500 kV line is in the public interest and this RTP and APS' RTAP development plan for the project are therefore approved.
7. The proposed Palo Verde to Liberty and Gila Bend to Liberty projects are in the public interest and this RTP and APS' RTAP development plan for the projects are therefore approved.

In its application, APS indicated that it is well-positioned to meet the REST requirements and exceed those requirements without adding any major transmission lines (including these RTPs) until approximately 2018.

Background

The Commission's Fifth BTA decision ordered Commission-regulated utilities to conduct joint workshops or planning meetings to develop ways to identify new RTPs and develop ways to have the RTPs approved and financed in order to support the growth of renewables in Arizona. Each utility was required to identify the top three renewable transmission projects in their respective service territories. Finally, the utilities were required to develop plans to identify future RTPs and develop plans and proposed funding mechanisms to construct the top three renewable transmission projects.

In response to the Commission's Fourth BTA decision in 2006, the Southwest Area Transmission ("SWAT") Sub-Regional Planning Group formed a Renewable Transmission Task Force ("RTTF"). Later, in response to the Fifth BTA decision in 2008, the RTTF established two subcommittees: the Arizona Renewable Resource and Transmission Identification Subcommittee ("ARRTIS") and a Finance Subcommittee. ARRTIS identified areas in Arizona where wind and solar resources were abundant and possibly available for utility-scale projects. The Finance Subcommittee's mission was to develop a methodology for RTP development in Arizona. In addition, the Finance Subcommittee worked to develop methods that would help utilities finance and construct RTPs. The Finance Subcommittee developed a RTAP methodology for identifying RTPs.

APS worked closely with the RTTF, including both the ARRTIS and Finance Subcommittee, as well as with other utilities and stakeholders to determine its top RTPs. APS believes that the most effective way to proceed is for APS to develop and construct the RTPs, in conjunction with others in some instances, recovering the development costs through the Federal Energy Regulatory Commission ("FERC") approved transmission rates and through the APS Transmission Cost Adjustor ("TCA").

In 2009, in a rate case settlement, APS agreed to acquire siting approval and construct "one or more new transmission lines or upgrades designed to facilitate delivery of solar and other renewable resources to the APS system." In order to meet this commitment, APS proposes to construct the Delany to Palo Verde 500 kV line.

Included in APS' most recent Ten-Year Plan are transmission projects that will support the development of renewable resources. Included are the Delany to Sun Valley 500 kV project, the Sun Valley to Trilby Wash 230 kV project, the Sun Valley to Morgan 500 kV project and the Morgan to Pinnacle Peak 500 kV project.

In its January 29, 2010 application, APS included the APS Renewable Transmission Action Plan, with a request for approval of the proposed RTAP, approval of the process to identify RTPs, approval that the next RTAP filing should be in parallel with the 2012 BTA process, approval of flexible timing and duration of CECs, and approval of APS' top four RTPs to be in the public interest.

The top four RTPs proposed by APS are:

1. Delaney to Palo Verde
2. Hassayampa to North Gila #2
- 3A. Palo Verde Hub to Liberty
- 3B. Gila Bend to Liberty Area

In addition to the top four RTPs mentioned above, APS included information about the Delany to Blythe project, which is the Arizona Portion of the Palo Verde-Devers II project. APS did not specifically request approval of this RTP.

In a response to Staff's data request, APS provided information to Staff that shows how many renewable generation projects are in the "interconnection queue" which could, if electricity contracts were signed, utilize each of the proposed RTPs in the APS RTAP. Table 1 summarizes the data from the APS response.

Staff notes that only a portion of proposed renewable generation projects will become economically viable and eventually be built. Table 1 is designed to show the maximum MW of new renewable capacity that **might** want to interconnect with each proposed RTP.

Table 1 includes a column entitled "Generators with CECs" which shows renewable generation projects which could use a particular RTP. Note that some projects are listed more than once, showing that, depending on where the electricity needs to be delivered, the owners of the renewable power plants have a choice of which RTP they wish to utilize.

Table 1: RENEWABLE GENERATION PROJECTS THAT COULD USE A PROPOSED RENEWABLE TRANSMISSION LINE

Project #	RTP Project	Number of Interconnection Requests	Possible MW that Could Use the Proposed RTP	Generators with CECs
1	Delany to Palo Verde (500 KV)	3	1,500 MW	Starwood – 500 MW (Decision No. 71442)
2	Hassayampa to North Gila # 2 (500 KV)	18	4,468 MW	Agua Caliente – 500 MW (Decision No. 71297)
3A	Palo Verde Hub to Liberty (500 KV)	80	9,313 MW	Abengoa/Solana – 280 MW (Decision No. 70531) Starwood – 500 MW (Decision No. 71442)
3B	Gila Bend to Liberty Area (500 KV)	80	9,313 MW	Agua Caliente – 500 MW (Decision No. 71297) Abengoa/Solana – 280 MW (Decision No. 70531) Starwood – 500 MW (Decision No. 71442)
4	Delany to Blythe (500 KV)	118	19,366 MW	Agua Caliente – 500 MW (Decision No. 71297) Abengoa/Solana – 280 MW (Decision No. 70531) Starwood – 500 MW (Decision No. 71442)

Staff has reviewed the APS application, the APS RTAP, and the APS responses to Staff's data requests.

Staff notes that although over 10,000 MW of proposed new renewable generation could potentially utilize the four proposed RTPs, no formal commitments have been made by any renewable project. In fact, only a handful of renewable projects have been through the formal Arizona Power Plant and Transmission Line Siting process and received a Certificate of Environmental Compatibility. Those renewable projects are;

1. Abengoa Solar/Solana: 500 MW
2. Starwood Solar I: 500 MW
3. Agua Caliente Solar: 500 MW
4. Arlington Valley Solar: 250 MW
5. Mesquite Solar: 500 MW
6. Hualapai Valley Solar: 340 MW

The fact that there is significant potential for the use of an RTP by any number of proposed renewable power plants does not guarantee that any of the proposed plants will, in fact, be built or will use any particular RTP.

Since the Commission has already determined that the incorporation of renewables into the utility generation portfolio mix is in the public interest, the next logical step would be that the Commission determine that the development and construction of new transmission lines, in general, to support the Commission-mandated growth in utility renewables is also in the public interest. However, such a general determination would not necessarily mean that any particular RTP is itself in the public interest.

In light of the fact that APS is asking the Commission for a declaration that the four RTPs are in the public interest, Staff believes that APS should be held to a very high standard of proving that the proposed RTP will benefit the utility and its customers. This standard would require APS to go through a four-step process to document the need for each proposed RTP. This process would clearly demonstrate the need for each individual RTP. Staff recommends the following RTP Approval Process:

Step 1: APS would conduct an "Open Season" solicitation of confidential letters of intent to bid on Renewable Requests for Proposals ("RFPs"). The letters of intent would identify the exact location of the proposed project, the technology proposed, and the project output. For those projects not wanting to bid in an APS RFP, but wanting to use a proposed RTP, renewable project developers' letters would indicate the details of their proposed usage.

Step 2: If there is a sufficient level of interest in a particular RTP, APS would publish a Request for Proposals for projects wanting to interconnect with and utilize a particular RTP. The RFP could cover more than one RTP if there is significant interest in more than one RTP. APS would select winning RFP projects and sign contracts with the winning developers.

Step 3: APS would need to obtain at least one signed contract from one significant proposed renewable plant owner for transmission service on the proposed RTP in order to proceed. Additional contracts by other renewable or conventional power plant developers would be helpful in demonstrating the need for the RTP.

Step 4: APS would apply to the Arizona Power Plant and Transmission Line Siting Committee for approval of a Certificate of Environmental Compatibility for the specific RTP. In the Commission decision, the ACC would address the issue of the RTP being in the public interest.

Staff has reviewed the process developed by the RTTF, and administered by APS, to identify the RTPs. Staff believes that the process was consistent with the Commission orders in the Fifth BTA final order (Decision No. 70635). Staff concludes that the process to identify RTPs is appropriate.

Staff has reviewed the APS Renewable Transmission Action Plan that was docketed on October 30, 2009. Staff believes that the RTAP process is appropriate and consistent with Commission decisions.

Staff has reviewed APS' proposal that the timing of the next RTAP filing should be in parallel with the 2012 BTA process. By including the RTAP filing in each BTA process, all stakeholders will be aware of the scope and depth of each utility's renewable transmission program. Staff supports this proposed timing.

APS, in its application, requested flexibility with the timing and duration of the CECs acquired for RTPs. Staff agrees that there should be maximum flexibility related to the timing and duration of the CECs for RTPs. The renewable industry is a new and growing industry. The industry is responding to increasing interest by utilities in purchasing more renewable electricity. This interest is increasing slowly and is projected to grow significantly over the next two decades. In order to accommodate the new demand and to set clear signals for developers where future transmission will be available to support the growing renewable industry, Staff recommends longer than normal duration of the CECs.



Steven M. Olea
Director
Utilities Division

SMO:RTW:lh\CH

ORIGINATOR: Ray Williamson

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BEFORE THE ARIZONA CORPORATION COMMISSION

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

IN THE MATTER OF THE APPLICATION)
OF ARIZONA PUBLIC SERVICE)
COMPANY FOR APPROVAL OF PLANS)
RELATED TO RENEWABLE)
TRANSMISSION PROJECTS)

DOCKET NO. E-01345A-10-0033
DECISION NO. _____
ORDER

Open Meeting
November 22 and 23, 2010
Phoenix, Arizona

BY THE COMMISSION:

Background

As part of the Fifth Biennial Transmission Assessment (“BTA”) Process, approved by Decision No. 70635 (December 11, 2008), Arizona electric utilities were required to file, by October 2009, a document identifying their top potential Renewable Transmission Projects (“RTPs”) that would support the growth of renewable resources in Arizona. On October 30, 2009, Arizona Public Service Company (“APS” or “Company”) filed its top potential RTPs in APS’ service territory. That filing included a proposed development approach and schedule. A key part of the Company’s October 2009 filing was its Renewable Transmission Action Plan (“RTAP”) which was developed in cooperation with other utilities and interested stakeholders. The intent of the RTAP is to create a method for RTP identification, approval and financing. APS emphasizes in its RTAP that cost recovery for the RTPs is critical to the viability of the projects.

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FINDINGS OF FACT

1
2 1. Arizona Public Service Company ("APS" or "Company") is engaged in providing
3 electric service within portions of Arizona, pursuant to authority granted by the Arizona
4 Corporation Commission.

5 2. On January 29, 2010, APS filed "The Application of Arizona Public Service
6 Company for Approval of Plans Related to Renewable Transmission Projects." Included were
7 descriptions of APS' "top three" RTPs and the APS Renewable Transmission Action Plan. In the
8 application, APS requested that the Commission determine the following:

9 A. The proposed process to identify RTPs is appropriate.

10 B. The proposed RTAP is appropriate.

11 C. The proposed timing of the next RTAP filing should be in parallel with the
12 2012 BTA process.

13 D. The proposed flexibility with the timing and duration of the Certificates of
14 Environmental Compatibility ("CECs") acquired for RTPs is appropriate.

15 E. The proposed Delany to Palo Verde 500 kV line is in the public interest and
16 this RTP and APS' RTAP development plan for the project are therefore
approved.

17 F. The proposed Palo Verde to North Gila 500 kV line is in the public interest and
18 this RTP and APS' RTAP development plan for the project are therefore
approved.

19 G. The proposed Palo Verde to Liberty and Gila Bend to Liberty projects are in the
20 public interest and this RTP and APS' RTAP development plan for the projects
21 are therefore approved.

22 3. In its application, APS indicated that it is well-positioned to meet the REST
23 requirements and exceed those requirements without adding any major transmission lines
24 (including these RTPs) until approximately 2018.

25 4. The Commission's Fifth BTA decision ordered Commission-regulated utilities to
26 conduct joint workshops or planning meetings to develop ways to identify new RTPs and develop
27 ways to have the RTPs approved and financed in order to support the growth of renewables in
28 Arizona. Each utility was required to identify the top three renewable transmission projects in

1 their respective service territories. Finally, the utilities were required to develop plans to identify
2 future RTPs and develop plans and proposed funding mechanisms to construct the top three
3 renewable transmission projects.

4 5. In response to the Commission's Fourth BTA decision in 2006, the Southwest Area
5 Transmission ("SWAT") Sub-Regional Planning Group formed a Renewable Transmission Task
6 Force ("RTTF"). Later, in response to the Fifth BTA decision in 2008, the RTTF established two
7 subcommittees: the Arizona Renewable Resource and Transmission Identification Subcommittee
8 ("ARRTIS") and a Finance Subcommittee. ARRTIS identified areas in Arizona where wind and
9 solar resources were abundant and possibly available for utility-scale projects. The Finance
10 Subcommittee's mission was to develop a methodology for RTP development in Arizona. In
11 addition, the Finance Subcommittee worked to develop methods that would help utilities finance
12 and construct RTPs. The Finance Subcommittee developed a RTAP methodology for identifying
13 RTPs.

14 6. APS worked closely with the RTTF, including both the ARRTIS and Finance
15 Subcommittee, as well as with other utilities and stakeholders to determine its top RTPs. APS
16 believes that the most effective way to proceed is for APS to develop and construct the RTPs, in
17 conjunction with others in some instances, recovering the development costs through the Federal
18 Energy Regulatory Commission ("FERC") approved transmission rates and through the APS
19 Transmission Cost Adjustor ("TCA").

20 7. In 2009, in a rate case settlement, APS agreed to acquire siting approval and
21 construct "one or more new transmission lines or upgrades designed to facilitate delivery of solar
22 and other renewable resources to the APS system." In order to meet this commitment, APS
23 proposes to construct the Delany to Palo Verde 500 kV line.

24 8. Included in APS' most recent Ten-Year Plan are transmission projects that will
25 support the development of renewable resources. Included are the Delany to Sun Valley 500 kV
26 project, the Sun Valley to Trilby Wash 230 kV project, the Sun Valley to Morgan 500 kV project
27 and the Morgan to Pinnacle Peak 500 kV project.

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1 9. In its January 29, 2010 application, APS included the APS Renewable
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4 BTA process, approval of flexible timing and duration of CECs, and approval of APS' top four
5 RTPs to be in the public interest.

6 10. The top four RTPs proposed by APS are:

- 7 1. Delaney to Palo Verde
- 8 2. Hassayampa to North Gila #2
- 9 3A. Palo Verde Hub to Liberty
- 3B. Gila Bend to Liberty Area

10 11. In addition to the top four RTPs mentioned above, APS included information about
11 the Delany to Blythe project, which is the Arizona Portion of the Palo Verde-Devers II project.
12 APS did not specifically request approval of this RTP.

13 12. In a response to Staff's data request, APS provided information to Staff that shows
14 how many renewable generation projects are in the "interconnection queue" which could, if
15 electricity contracts were signed, utilize each of the proposed RTPs in the APS RTAP. Table 1
16 summarizes the data from the APS response.

17 13. Staff notes that only a portion of proposed renewable generation projects will
18 become economically viable and eventually be built. Table 1 is designed to show the maximum
19 MW of new renewable capacity that **might** want to interconnect with each proposed RTP.

20 14. Table 1 includes a column entitled "Generators with CECs" which shows
21 renewable generation projects which could use a particular RTP. Note that some projects are listed
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23 of the renewable power plants have a choice of which RTP they wish to utilize.

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15. Staff has reviewed the APS application, the APS RTAP, and the APS responses to Staff's data requests.

16. Staff notes that although over 10,000 MW of proposed new renewable generation could potentially utilize the four proposed RTPs, no formal commitments have been made by any renewable project. In fact, only a handful of renewable projects have been through the formal Arizona Power Plant and Transmission Line Siting process and received a Certificate of Environmental Compatibility. Those renewable projects are;

- A. Abengoa Solar/Solana: 500 MW
- B. Starwood Solar I: 500 MW
- C. Agua Caliente Solar: 500 MW
- D. Arlington Valley Solar: 250 MW
- E. Mesquite Solar: 500 MW
- F. Hualapai Valley Solar: 340 MW

1 17. The fact that there is significant potential for the use of an RTP by any number of
2 proposed renewable power plants does not guarantee that any of the proposed plants will, in fact,
3 be built or will use any particular RTP.

4 18. Since the Commission has already determined that the incorporation of renewables
5 into the utility generation portfolio mix is in the public interest, the next logical step would be that
6 the Commission determine that the development and construction of new transmission lines, in
7 general, to support the Commission-mandated growth in utility renewables is also in the public
8 interest. However, such a general determination would not necessarily mean that any particular
9 RTP is itself in the public interest.

10 19. In light of the fact that APS is asking the Commission for a declaration that the four
11 RTPs are in the public interest, Staff believes that APS should be held to a very high standard of
12 proving that the proposed RTP will benefit the utility and its customers. This standard would
13 require APS to go through a four-step process to document the need for each proposed RTP. This
14 process would clearly demonstrate the need for each individual RTP. Staff recommends the
15 following RTP Approval Process:

16 Step 1: APS would conduct an "Open Season" solicitation of confidential letters of
17 intent to bid on Renewable Requests for Proposals ("RFPs"). The letters of intent
18 would identify the exact location of the proposed project, the technology proposed,
19 and the project output. For those projects not wanting to bid in an APS RFP, but
20 wanting to use a proposed RTP, renewable project developers' letters would
21 indicate the details of their proposed usage.

22 Step 2: If there is a sufficient level of interest in a particular RTP, APS would
23 publish a Request for Proposals for projects wanting to interconnect with and utilize
24 a particular RTP. The RFP could cover more than one RTP if there is significant
25 interest in more than one RTP. APS would select winning RFP projects and sign
26 contracts with the winning developers.

27 Step 3: APS would need to obtain at least one signed contract from one significant
28 proposed renewable plant owner for transmission service on the proposed RTP in
order to proceed. Additional contracts by other renewable or conventional power
plant developers would be helpful in demonstrating the need for the RTP.

Step 4: APS would apply to the Arizona Power Plant and Transmission Line Siting
Committee for approval of a Certificate of Environmental Compatibility for the
specific RTP. In the Commission decision, the ACC would address the issue of the
RTP being in the public interest.

1 the APS Renewable Transmission Plan, and to approve the four-step "Renewable transmission
2 Project Process" recommended by Staff.

3 ORDER

4 IT IS THEREFORE ORDERED that the process developed by the Renewable
5 Transmission Task Force, and administered by Arizona Public Service Company, to identify the
6 Renewable Transmission Projects is consistent with Commission orders in the Fifth Biennial
7 Transmission Assessment final order (Decision No. 70635) and is appropriate.

8 IT IS FURTHER ORDERED that the Arizona Public Service Company Renewable
9 Transmission Action Plan is appropriate and consistent with the Commission Fifth Biennial
10 Transmission Assessment final order.

11 IT IS FURTHER ORDERED that the timing of the next Renewable Transmission Action
12 Plan filing shall be in parallel with the 2012 Biennial Transmission Assessment process.

13 IT IS FURTHER ORDERED that Arizona Public Service Company shall follow the
14 "Renewable Transmission Project Process" described below:

15 Step 1: APS shall conduct an "Open Season" solicitation of confidential letters of
16 intent to bid on Renewable Requests for Proposals ("RFPs"). The letters of intent
17 shall identify the exact location of the proposed project, the technology proposed,
18 and the project output. For those projects not wanting to bid in an APS RFP, but
wanting to use a proposed RTP, renewable project developers' letters shall indicate
the details of their proposed usage.

19 Step 2: If there is a sufficient level of interest in a particular RTP, APS shall
20 publish a Request for Proposals for projects wanting to interconnect with and utilize
21 a particular RTP. The RFP may cover more that one RTP if there is significant
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Step 3: APS must obtain at least one signed contract from one significant proposed renewable plant owner for transmission service on the proposed RTP in order to proceed. Additional contracts by other renewable or conventional power plant developers would be helpful in demonstrating the need for the RTP.

Step 4: APS must apply to the Arizona Power Plant and Transmission Line Siting Committee for approval of a Certificate of Environmental Compatibility for the specific RTP. In the Commission decision, the ACC will address the issue of the RTP being in the public interest.

IT IS FURTHER ORDERED that this Decision become effective immediately.

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, ERNEST G. JOHNSON, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2010.

ERNEST G. JOHNSON
EXECUTIVE DIRECTOR

DISSENT: _____

DISSENT: _____

SMO:RTW:lhm\CH

1 SERVICE LIST FOR: Arizona Public Service Company
2 DOCKET NO. E-01345A-10-0033

3 Ms. Meghan Grabel
4 Attorney
5 Arizona Public Service Company
6 Post Office Box 53999 / Station 9905
7 Phoenix, Arizona 85072-3999

8 Mr. Steven M. Olea
9 Director, Utilities Division
10 Arizona Corporation Commission
11 1200 West Washington Street
12 Phoenix, Arizona 85007

13 Ms. Janice M. Alward
14 Chief Counsel, Legal Division
15 Arizona Corporation Commission
16 1200 West Washington Street
17 Phoenix, Arizona 85007

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