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Attorneys for Intervenors IBEW Locals 387, 640 & 769

BEFORE THE ARIZONA

CORPORATION COMMISSION

IN THE MATTER OF THE  
APPLICATION OF ARIZONA PUBLIC  
SERVICE 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, AND TO APPROVE RATE  
SCHEDULES DESIGNED TO  
DEVELOP SUCH RETURN.

Docket No. E-01345A-11-0224

**NOTICE OF FILING TESTIMONY  
OF G. DAVID VANDEVER IN  
SUPPORT OF SETTLEMENT  
AGREEMENT**

Pursuant to the Chief Administrative Law Judge's Procedural Order (p. 2) dated December 23, 2011, Intervenors Local Union 387, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 387"), Local Union 640, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 640"), and Local Union 769, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 769"), by and through undersigned counsel, hereby provide notice of their filing of the attached Testimony of G. David Vandever in Support of Settlement Agreement in this docket.

RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of January, 2012.

LUBIN & ENOCH, P.C.

Jarrett J. Haskovec, Esq.  
Attorney for Intervenors

IBEW Locals 387, 640 & 769

1 Original and thirteen (13) copies  
of Intervenors' Notice filed  
2 this 17<sup>th</sup> day of January, 2012, with:

3 Arizona Corporation Commission  
Docket Control Center  
4 1200 West Washington Street  
Phoenix, Arizona 85007-2996

5  
6 Copies of the foregoing  
transmitted electronically or  
via regular mail this same date to:

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19  
20   
21

1 **Q1. PLEASE STATE YOUR NAME AND POSITION.**

2 A1. G. David Vandever. I am the Business Manager of IBEW Local 387, which is,  
3 among other things, the exclusive bargaining representative of approximately one-  
4 thousand nine-hundred (1,900) non-managerial employees of APS.  
5

6 **Q2. ARE YOU THE SAME G. DAVID VANDEVER WHOSE DIRECT**  
7 **TESTIMONY WAS FILED IN THIS MATTER ON NOVEMBER 18, 2011?**

8 A2. Yes.  
9

10 **Q3. DO YOU HAVE ANY REVISIONS, CORRECTIONS, OR UPDATES THAT**  
11 **YOU WOULD LIKE TO MAKE TO YOUR PREVIOUS TESTIMONY?**

12 A3. Yes. Many of the figures and calculations contained in my direct testimony were  
13 based on numbers provided by APS in response to our first set of data requests.  
14 Since the time of the filing of my direct testimony, APS has served a supplemental  
15 response to items 6-10 in order to correct and/or update the figures originally  
16 provided. A copy of the supplemental response is attached hereto as Exhibit A.  
17 As a result, some of the figures and calculations originally included in my direct  
18 testimony may need to be revised. Be that as it may, I believe the revised numbers  
19 still demonstrate the need to address the pressing challenges associated with the  
20 "aging workforce" problem.  
21

22 **Q4. PLEASE TELL US MORE ABOUT IBEW LOCAL 640 AND THE TYPE**  
23 **OF WORK THE LOCAL'S MEMBERS PERFORM.**

24 A4. Sure. Although I am not a member of that local, I am quite familiar with it. IBEW  
25 Local 640 has represented workers in the electrical construction industry for 87  
26 years. IBEW Local 640 has the highest caliber of skilled and trained Inside  
27 Construction Journeyman Wiremen in the State of Arizona. The Local constantly  
28 proves that point on job sites throughout the State every day to the customers it

1 serves through the Local's approximately 75 small, medium, and large capacity  
2 signatory employers. IBEW Local 640's principal work is the construction and  
3 maintenance of commercial and industrial facilities.

4  
5 **Q5. PLEASE DESCRIBE IBEW LOCAL 640'S RELATIONSHIP WITH APS**  
6 **AND ANY VISION THE LOCAL HAS FOR ENHANCING THE**  
7 **RELATIONSHIP IN THE FUTURE.**

8 A5. Historically, APS and IBEW Local 640 have had a relatively stable, mutually-  
9 beneficial relationship whereby the Local's members and their employers provided  
10 construction and maintenance services for many APS projects and facilities. From  
11 the statewide coal-fired plants to the Palo Verde Nuclear Generating Station to the  
12 many associated sub-stations and switching yards, IBEW Local 640's members  
13 have had a successful history of providing Arizona Public Service an outstanding  
14 level of quality and value in the construction of these facilities. In addition, a few  
15 years ago, the Local provided APS with qualified manpower for use in the  
16 Company's "residential taskforce" and stands ready to provide qualified solar  
17 installation manpower as well.

18  
19 Unfortunately, at some point in the recent past, APS's interest in utilizing the  
20 services of the Local's highly-trained workforce and the associated contractors to  
21 meet its facility construction and maintenance needs seems to have waned.  
22 Although there are still a couple of associated contractors still bidding, and  
23 occasionally winning, APS work, it seems that many of the contractors no longer  
24 pursue this work due to the recent, statewide trend of awarding to the lowest  
25 "responsible" bidder. The Local acknowledges that the signatory contractors are  
26 seldom the rock-bottom, cheapest bid, but believes that, more often than not, one  
27 gets what one pays for with respect to the final product as well. IBEW Local 640  
28 expresses its sincere hope that using the cheapest labor on every construction and

1 maintenance project will not become the “new norm” and cautions that the use of  
2 such labor may significantly impair APS’s ability to provide safe and reliable  
3 power to its customers in the long-run.

4  
5 IBEW Local 640 seeks to re-establish a working relationship with APS that  
6 redounds to their mutual benefit. IBEW Local 640 emphatically does not seek to  
7 be handed work, but rather to have APS advise the Local when projects arise so  
8 that it may provide APS with two or three qualified union contractors, whose size  
9 and scope are commensurate with the project at hand, to bid on the work. IBEW  
10 Local 640 would like the opportunity for its employers to prove to APS that value  
11 trumps price and that by using its highly-skilled and trained workforce, composed  
12 primarily of local residents who earn a decent wage and benefit package and many  
13 of whom are APS customers themselves, APS receives a greater value on their  
14 construction and maintenance projects and, in turn, provides a greater value to  
15 their customers. With a new, more flexible work model in the Local’s collective  
16 bargaining agreement relating to quality, efficiency, and composite value in a skill-  
17 appropriate crew mix, the Local’s family of signatory contractors have the tools  
18 needed to provide even better value to the customer’s bottom line than ever before.

19  
20 **Q6. PLEASE PROVIDE SOME EXAMPLES OF APS PROJECTS IN WHICH**  
21 **IBEW LOCAL 769 MEMBERS HAVE BEEN RECENTLY ENGAGED.**

22 **A6.** Certainly. As I noted previously, IBEW Local 769 is, among other things, the  
23 exclusive bargaining agent for all IBEW outside line workers in the State of  
24 Arizona and its scope of work also includes tele-data, street light and trenching.  
25 For example, IBEW Local 769 has provided outside line construction work for  
26 APS through Wilson Construction, Klondyke, NPL, Henkels & McCoy and  
27 Sturgeon Electric, among others. At any given time, IBEW Local 769 will have  
28 anywhere from five (5) to two-hundred (200) of its bargaining unit employees

1 working for subcontractors of APS. In the last quarter of 2011, IBEW Local 769  
2 members and their respective employers have been contracted to provide services  
3 for APS projects across much of Arizona as follows:

- 4 • Agua Caliente Solar Project – 500 KV Switch Yard and Sub-Station,  
5 Dateland, Klondyke LLC (contractor);
- 6 • Bouse – 230 KV Harcuvar Grassroot Transmission Line, National Power Line  
7 (contractor);
- 8 • Perrin Ranch Windfarm – 500 KV Switch Yard and Sub-Station, Williams,  
9 Klondyke LLC (contractor);
- 10 • Pinnacle Peak – 500 KV-230 KV Switch Yard and Sub-Station Upgrade,  
11 Scottsdale, Wilson Utility Construction (contractor);
- 12 • 69 KV Re-Conductor, Hope, Atkinson Power (contractor); and
- 13 • several small distribution projects in Maricopa County.

14  
15 **Q7. DO IBEW LOCALS 387, 640 AND 769 SUPPORT THE ADOPTION OF**  
16 **THE JANUARY 6, 2012 SETTLEMENT AGREEMENT?**

17 A7. Yes. On behalf of the more than one-thousand nine-hundred (1,900) non-  
18 managerial workers at APS who are represented by IBEW Local 387, I would like  
19 to express the Union's unqualified support for the proposed Settlement Agreement.  
20 In addition, I know that our two sister locals, IBEW Locals 640 and 769, are also  
21 fully supportive of the Settlement Agreement.

22  
23 **Q8. ARE THERE SPECIFIC PORTIONS OF THE SETTLEMENT**  
24 **AGREEMENT THAT IBEW LOCALS 387, 640 AND 769 ARE**  
25 **PARTICULARLY INTERESTED IN?**

26 A8. Yes. While IBEW Locals 387, 640 and 769 support the adoption of proposed  
27 Settlement Agreement in its entirety, we are particularly interested in, and/or took  
28 an especially active role in negotiating or otherwise considering, the following

1 paragraphs of the proposed Settlement Agreement: ¶¶ 1.4 and 18.2.

2  
3 **Q9. PLEASE EXPLAIN WHY IBEW LOCALS 387, 640, AND 769 ARE**  
4 **PARTICULARLY INTERESTED IN ¶ 1.4.**

5 A9. IBEW Locals 387, 640, and 769 note the inclusion of Paragraph 1.4. In it, the  
6 parties simply acknowledge the fact that Article XV, § 3 of the Arizona  
7 Constitution places the interests of public service employees on par with those of  
8 patrons. The interests of both constituencies, in turn, are of more importance than  
9 those of the corporation's shareholders.

10  
11 **Q10. ARE YOU AWARE OF ANY LEGAL AUTHORITY SUPPORTING THIS**  
12 **PROPOSITION?**

13 A10. Certainly. In its 1984 decision in *Cogent Pub. Serv. v. Arizona Corp. Comm'n*,  
14 142 Ariz. 52, 56-57, 688 P.2d 698, 702-03, Division One expressly, and in my  
15 opinion, correctly, held that "the jurisprudence of our State made it plain long ago  
16 that the interests of public-service corporation stockholders must not be permitted  
17 to overshadow those of the public served." In support of this quite unremarkable  
18 proposition, our Court of Appeals relied upon a series of U.S. and Arizona  
19 Supreme Court decisions dating back to 1896.<sup>1</sup> Beyond that, I would also point  
20 out that while Article XV, § 3 of the Arizona Constitution mentions "employees  
21 and patrons" as key stakeholders, it does not mention shareholders as such.

22  
23 **Q11. PLEASE EXPLAIN WHY IBEW LOCALS 387, 640, AND 769 ARE**  
24 **PARTICULARLY INTERESTED IN ¶ 18.2.**

25 A11. In the Application to Intervene and Direct Testimony filed on their behalf in this  
26

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27 <sup>1</sup> See *Salt River Valley Canal Co. v. Nelszen*, 10 Ariz. 9, 13, 85 P. 117, 119 (1906)  
28 [citing *Covington & Lexington Turnpike Road Co. v. Sanford*, 164 U.S. 578, 596 (1896)].

1 matter, IBEW Locals 387, 640, and 769 raised significant concerns related to  
2 APS's workforce planning moving forward and, in particular, the "aging  
3 workforce" problem that so many utilities, including APS, face and will continue  
4 to face in the years to come. Paragraph 18.2 highlights these concerns and serves  
5 to focus the parties' and the Commission's attention on these important matters –  
6 both now and going forward. The reporting requirements included in this  
7 paragraph will ensure that APS undertakes at least an annual review and  
8 assessment of its workforce planning for critical positions in light of these  
9 challenges and considers what sorts of recruitment and hiring efforts it must  
10 undertake to meet these challenges ahead of anticipated retirements. I can say,  
11 without exaggeration or hyperbole, that I firmly believe APS's ability to provide  
12 safe and reliable electric power in Arizona in the years to come depends to no  
13 small degree on the steps the Company takes to meet these impending challenges.

14  
15 **Q12. ARE THERE ANY PORTIONS OF THE PROPOSED SETTLEMENT**  
16 **AGREEMENT WITH WHICH IBEW LOCALS 387, 640, AND 769 ARE**  
17 **LESS PLEASED?**

18 A12. Sure. We would have preferred that APS receive even more – potentially far more  
19 – rate relief than what is set forth in ¶ 3.1 of the Settlement Agreement.

20 Notwithstanding these reservations, however, IBEW Local 387, 640, and 769  
21 recognize that the consummation of a comprehensive Settlement Agreement  
22 among nearly two dozen different parties with often disparate and competing  
23 interests is no so small feat. It is for that reason that we fully and strongly support  
24 the Commission's adoption of the proposed Settlement Agreement *in toto*.

25  
26 **Q13. DO YOU HAVE ANY OTHER COMMENTS YOU WOULD LIKE TO**  
27 **SHARE WITH THE COMMISSION REGARDING THE INSTANT**  
28 **SETTLEMENT?**

1 A13. Yes. I want to make it abundantly clear to the Commission and APS that, by  
2 agreeing to this Settlement Agreement, IBEW Local 387 has not, and does not,  
3 agree to any modification, express or implied, to the terms and conditions of its  
4 collective bargaining agreement with APS. That is not to say that I believe this  
5 will ever become a problem *vis-à-vis* IBEW Local 387's relationship with APS; in  
6 fact, I do not believe that is the case. Nevertheless, I just want to make certain that  
7 there is no confusion in this regard moving forward.

8  
9 **Q14. DOES THIS CONCLUDE YOUR TESTIMONY?**

10 A14. Yes.

11 F:\Danette\IBEW L. 387 1445-100.Vandever\testimony#2.pld.wpd



**JEFFREY W. JOHNSON**  
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December 5, 2011

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RE: Arizona Public Service Company's 2010 Test Year Rate Case  
Docket No. E-01345A-11-0224

Attached please find Arizona Public Service Company's Supplemental Response to IBEW's First Set of Data Requests, Questions 6-10 in the above-referenced matter.

If you have any questions regarding this information, please contact Zachary Fryer at (602)250-4167.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey W. Johnson", is written over a horizontal line.

Jeffrey W. Johnson

JJ/sl  
Attachment

**IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS  
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES  
DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN  
DOCKET NO. E-01345A-11-0224  
OCTOBER 26, 2011**

**IBEW 1.6:** Please state, for each the past five (5) calendar years, the share of retirement-eligible employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request, who opted to retire.

**Supplemental Response to IBEW 1.6:** Below are the percentages and number of individuals in each of the job classifications that retired from 2010 to present. The percentages have been updated to reflect the percent of actual to eligible retirements per job classification per year. Please disregard the previous submittal since there was erroneous data.

**Retirements: 2006-2010**

| <b>Job</b>             |                                | <b>2006</b> | <b>2007</b> | <b>2008</b> | <b>2009</b> | <b>2010</b> |
|------------------------|--------------------------------|-------------|-------------|-------------|-------------|-------------|
| Auxiliary Operators    | Oper Auxiliaries               | 0           | 0           | 0           | 1           | 1           |
| Auxiliary Operators    | Ops Tech Trainee T-1           | 0           | 0           | 0           | 0           | 0           |
| Auxiliary Operators    | OTTRNEET1 CONTROL OP/MECH MNTC | 0           | 0           | 0           | 0           | 0           |
| Auxiliary Operators    | PS3T2 AO / MECH MNTC           | 0           | 0           | 0           | 0           | 1           |
| Auxiliary Operators    | PS3T2 MECH MNTC / AO           | 0           | 0           | 0           | 0           | 0           |
| Control Operator       | Control Operator               | 1           | 1           | 2           | 0           | 0           |
| Control Operator       | Oper Control                   | 0           | 0           | 0           | 1           | 0           |
| Control Operator       | OPS TECH CONTROL OP/INT INSTR  | 0           | 0           | 0           | 3           | 0           |
| Control Operator       | OPS TECH CONTROL OP/MECH MNTC  | 0           | 0           | 0           | 0           | 1           |
| Control Operator       | OPS TECH CONTROL OP/PLATE WELD | 0           | 0           | 0           | 0           | 0           |
| Electrician-Journeyman | Electrician                    | 1           | 7           | 6           | 0           | 0           |
| Lineman-Journeyman     | Lineman Hotstick               | 0           | 0           | 0           | 0           | 0           |
| Lineman-Journeyman     | Lineman Journeyman             | 1           | 2           | 4           | 2           | 2           |
| Technician-E&I         | E&I TECH ELECT / ADV INSTR     | 0           | 0           | 0           | 0           | 0           |
| Technician-E&I         | E&I TECH INSTR REPR/ADV ELECT  | 0           | 0           | 0           | 0           | 2           |
| Technician-E&I         | E&I Technician                 | 3           | 2           | 2           | 1           | 1           |

Witness: Daniel T. Froetscher  
Page 1 of 2

**IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS  
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES  
DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN  
DOCKET NO. E-01345A-11-0224  
OCTOBER 26, 2011**

Supplemental  
Response to  
IBEW 1.6  
Continued:

**Retirements: 2006-2010**

| Job                    |                                | 2006 | 2007 | 2008 | 2009 | 2010 |
|------------------------|--------------------------------|------|------|------|------|------|
| Auxiliary Operators    | Oper Auxiliaries               | 0%   | 0%   | 0%   | 33%  | 100% |
| Auxiliary Operators    | Ops Tech Trainee T-1           | 0%   | 0%   | 0%   | 0%   | 0%   |
| Auxiliary Operators    | OTTRNEET1 CONTROL OP/MECH MNTC | 0%   | 0%   | 0%   | 0%   | 0%   |
| Auxiliary Operators    | PS3T2 AO / MECH MNTC           | 0%   | 0%   | 0%   | 0%   | 14%  |
| Auxiliary Operators    | PS3T2 MECH MNTC / AO           | 0%   | 0%   | 0%   | 0%   | 0%   |
| Control Operator       | Control Operator               | 50%  | 25%  | 40%  | 0%   | 33%  |
| Control Operator       | Oper Control                   | 0%   | 0%   | 0%   | 50%  | 0%   |
| Control Operator       | OPS TECH CONTROL OP/INT INSTR  | 0%   | 0%   | 0%   | 33%  | 14%  |
| Control Operator       | OPS TECH CONTROL OP/MECH MNTC  | 0%   | 0%   | 0%   | 0%   | 19%  |
| Control Operator       | OPS TECH CONTROL OP/PLATE WELD | 0%   | 0%   | 0%   | 0%   | 0%   |
| Electrician-Journeyman | Electrician                    | 8%   | 24%  | 14%  | 0%   | 11%  |
| Lineman-Journeyman     | Lineman Hotstick               | 0%   | 0%   | 0%   | 0%   | 0%   |
| Lineman-Journeyman     | Lineman Journeyman             | 5%   | 5%   | 6%   | 3%   | 7%   |
| Technician-E&I         | E&I TECH ELECT / ADV INSTR     | 0%   | 0%   | 0%   | 0%   | 13%  |
| Technician-E&I         | E&I TECH INSTR REPR/ADV ELECT  | 0%   | 0%   | 0%   | 0%   | 40%  |
| Technician-E&I         | E&I Technician                 | 100% | 40%  | 67%  | 17%  | 33%  |

**IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS  
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES  
DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN  
DOCKET NO. E-01345A-11-0224  
OCTOBER 26, 2011**

**IBEW 1.7:** Please state the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who are presently retirement eligible.

**Supplemental Response to IBEW 1.7:** Please disregard the previous submittal since there was erroneous data.

**Retirement Eligibility Summary**

| <b>Job</b>                 |                                   | <b>Current<br/>(9/30/11)</b> | <b>Current<br/>(9/30/11)</b> |
|----------------------------|-----------------------------------|------------------------------|------------------------------|
| Auxiliary Operators        | Oper Auxiliaries                  | 0                            | 0%                           |
| Auxiliary Operators        | Ops Tech Trainee T-1              | 0                            | 0%                           |
| Auxiliary Operators        | OTTRNEET1 CONTROL OP/MECH<br>MNTC | 2                            | 28%                          |
| Auxiliary Operators        | PS3T2 AO / MECH MNTC              | 23                           | 21%                          |
| Auxiliary Operators        | PS3T2 MECH MNTC / AO              | 0                            | 0%                           |
| Control Operator           | Control Operator                  | 0                            | 0%                           |
| Control Operator           | Oper Control                      | 0                            | 0%                           |
| Control Operator           | OPS TECH CONTROL OP/ INT<br>INSTR | 7                            | 29%                          |
| Control Operator           | OPS TECH CONTROL OP/ MECH<br>MNTC | 13                           | 26%                          |
| Control Operator           | OPS TECH CONTROL OP/PLATE<br>WELD | 1                            | 100%                         |
| Electrician-<br>Journeyman | Electrician                       | 11                           | 10%                          |
| Lineman-Journeyman         | Lineman Hotstick                  | 4                            | 27%                          |
| Lineman-Journeyman         | Lineman Journeyman                | 22                           | 12%                          |
| Technician-E&I             | E&I TECH ELECT / ADV INSTR        | 13                           | 45%                          |
| Technician-E&I             | E&I TECH INSTR REPR/ADV ELECT     | 5                            | 29%                          |
| Technician-E&I             | E&I Technician                    | 8                            | 15%                          |

**IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS  
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES  
DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN  
DOCKET NO. E-01345A-11-0224  
OCTOBER 26, 2011**

**IBEW 1.8:** Please state: (1) the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who will be retirement eligible between the present and December 31, 2012; and (2) anticipated hiring and attrition levels for each of the job classifications referenced in the preceding data request between the present and December 31, 2012.

**Supplemental Response to IBEW 1.8:** APS provides the following information on retirement eligibility between September 30, 2011 and December 31, 2012 and does not have information to respond to anticipated hiring and attrition levels. Please disregard the previous submittal since there was erroneous data.

**Retirement Eligibility Summary**

| <b>Job</b>                 |                                   | <b>9/30/11<br/>-12/31/12</b> | <b>9/30/11<br/>-12/31/12</b> |
|----------------------------|-----------------------------------|------------------------------|------------------------------|
| Auxiliary Operators        | Oper Auxiliaries                  | 0                            | 0%                           |
| Auxiliary Operators        | Ops Tech Trainee T-1              | 0                            | 0%                           |
| Auxiliary Operators        | OTTRNEET1 CONTROL OP/MECH<br>MNTC | 2                            | 25%                          |
| Auxiliary Operators        | PS3T2 AO / MECH MNTC              | 29                           | 26%                          |
| Auxiliary Operators        | PS3T2 MECH MNTC / AO              | 0                            | 0%                           |
| Control Operator           | Control Operator                  | 0                            | 0%                           |
| Control Operator           | Oper Control                      | 0                            | 0%                           |
| Control Operator           | OPS TECH CONTROL OP/ INT INSTR    | 9                            | 38%                          |
| Control Operator           | OPS TECH CONTROL OP/ MECH<br>MNTC | 15                           | 30%                          |
| Control Operator           | OPS TECH CONTROL OP/PLATE<br>WELD | 1                            | 100%                         |
| Electrician-<br>Journeyman | Electrician                       | 13                           | 12%                          |
| Lineman-<br>Journeyman     | Lineman Hotstick                  | 4                            | 27%                          |
| Lineman-<br>Journeyman     | Lineman Journeyman                | 27                           | 15%                          |
| Technician-E&I             | E&I TECH ELECT / ADV INSTR        | 15                           | 52%                          |
| Technician-E&I             | E&I TECH INSTR REPR/ADV ELECT     | 6                            | 35%                          |
| Technician-E&I             | E&I Technician                    | 9                            | 17%                          |

**IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS  
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES  
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DOCKET NO. E-01345A-11-0224  
OCTOBER 26, 2011**

IBEW 1.9: Please state: (1) the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who will be retirement eligible between January 1, 2013, and December 31, 2014; and (2) anticipated hiring and attrition levels for each of the job classifications referenced in the preceding data request between January 1, 2013, and December 31, 2014.

Supplemental Response to IBEW 1.9: APS provides the following information on retirement eligibility between January 1, 2013 and December 31, 2014 and does not have information to respond to anticipated hiring and attrition levels. Please disregard the previous submittal since there was erroneous data.

**Retirement Eligibility Summary**

|                        | <b>Job</b>                     | <b>1/1/13 -<br/>12/31/14</b> | <b>1/1/13 -<br/>12/31/14</b> |
|------------------------|--------------------------------|------------------------------|------------------------------|
| Auxiliary Operators    | Oper Auxiliaries               | 1                            | 100%                         |
| Auxiliary Operators    | Ops Tech Trainee T-1           | 0                            | 0%                           |
| Auxiliary Operators    | OTTRNEET1 CONTROL OP/MECH MNTC | 3                            | 38%                          |
| Auxiliary Operators    | PS3T2 AO / MECH MNTC           | 40                           | 36%                          |
| Auxiliary Operators    | PS3T2 MECH MNTC / AO           | 0                            | 0%                           |
| Control Operator       | Control Operator               | 0                            | 0%                           |
| Control Operator       | Oper Control                   | 1                            | 100%                         |
| Control Operator       | OPS TECH CONTROL OP/ INT INSTR | 12                           | 50%                          |
| Control Operator       | OPS TECH CONTROL OP/ MECH MNTC | 21                           | 42%                          |
| Control Operator       | OPS TECH CONTROL OP/PLATE WELD | 1                            | 100%                         |
| Electrician-Journeyman | Electrician                    | 26                           | 23%                          |
| Lineman-Journeyman     | Lineman Hotstick               | 4                            | 27%                          |
| Lineman-Journeyman     | Lineman Journeyman             | 40                           | 22%                          |
| Technician-E&I         | E&I TECH ELECT / ADV INSTR     | 17                           | 59%                          |
| Technician-E&I         | E&I TECH INSTR REPR/ADV ELECT  | 11                           | 65%                          |
| Technician-E&I         | E&I Technician                 | 16                           | 30%                          |

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DOCKET NO. E-01345A-11-0224  
OCTOBER 26, 2011**

**IBEW 1.10:** Please state: (1) the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who will be retirement eligible between January 1,2015, and December 31,2016; and (2) anticipated hiring and attrition levels for each of the job classifications referenced in the preceding data request between January 1,2015, and December 31,2016.

**Supplemental Response to IBEW 1.10:** APS provides the following information on retirement eligibility between January 1, 2015 and December 31, 2016 and does not have information to respond to anticipated hiring and attrition levels. Please disregard the previous submittal since there was erroneous data.

**Retirement Eligibility Summary**

| <b>Job</b>                 |                                   | <b>1/1/14 -<br/>12/31/16</b> | <b>1/1/14 -<br/>12/31/16</b> |
|----------------------------|-----------------------------------|------------------------------|------------------------------|
| Auxiliary Operators        | Oper Auxiliaries                  | 1                            | 100%                         |
| Auxiliary Operators        | Ops Tech Trainee T-1              | 0                            | 0%                           |
| Auxiliary Operators        | OTTRNEET1 CONTROL<br>OP/MECH MNTC | 5                            | 63%                          |
| Auxiliary Operators        | PS3T2 AO / MECH MNTC              | 51                           | 46%                          |
| Auxiliary Operators        | PS3T2 MECH MNTC / AO              | 0                            | 0%                           |
| Control Operator           | Control Operator                  | 0                            | 0%                           |
| Control Operator           | Oper Control                      | 1                            | 100%                         |
| Control Operator           | OPS TECH CONTROL OP/ INT<br>INSTR | 15                           | 63%                          |
| Control Operator           | OPS TECH CONTROL OP/ MECH<br>MNTC | 28                           | 56%                          |
| Control Operator           | OPS TECH CONTROL OP/PLATE<br>WELD | 1                            | 100%                         |
| Electrician-<br>Journeyman | Electrician                       | 37                           | 33%                          |
| Lineman-Journeyman         | Lineman Hotstick                  | 4                            | 27%                          |
| Lineman-Journeyman         | Lineman Journeyman                | 53                           | 29%                          |
| Technician-E&I             | E&I TECH ELECT / ADV INSTR        | 17                           | 59%                          |
| Technician-E&I             | E&I TECH INSTR REPR/ADV<br>ELECT  | 13                           | 76%                          |
| Technician-E&I             | E&I Technician                    | 25                           | 46%                          |

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