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Arizona Corporation Commission  
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ARIZONA CORPORATION COMMISSION  
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January 17, 2014

RE: Commission's Inquiry into Potential Impacts to the Current Utility Model Resulting from Innovative and Technological Developments in Generation and Delivery of Energy, Docket No. E-00000J-0375 (pertaining to closed Docket No. E-00000W-13-0135, Commission's Inquiry into Retail Electric Competition)

Dear Chairman Stump, Commissioners & Interested Stakeholders:

On September 11, 2013, pursuant to a vote by the Commission in a Staff Open Meeting, Docket No. E-0000W-13-0135 - in the Matter of the Commission's inquiry into Retail Electric Competition - was closed. At that same Open Meeting, a majority of Commissioners voted to open a generic docket to discuss innovation and technological developments in the energy industry. On December 5, 2013 Commissioner Robert Burns proposed the scope for this docket to review major innovations and technological developments that could impact the "current energy utility model in Arizona." The Commission requested comments on the proposed scope of the docket which explicitly seeks to examine areas including but not limited to: distributed generation, energy efficiency, demand response, real-time pricing, advanced metering infrastructure ("AMI"), and products and services that leverage AMI, as well as "changes in market structures, system operations and planning, rate designs, and regulatory policies resulting from or needed to facilitate the adoption of the technology or innovation."

The Retail Energy Supply Association ("RESA")<sup>1</sup> supports the Commission's endeavor to stay apprised of innovations and technological developments that could impact Arizona's energy markets. RESA's core belief is that competitive wholesale and retail energy markets are fundamentally the most efficient and productive mechanism for bringing technologically-based value-added products and services to consumers and the marketplace. Competitive energy service providers are motivated to continue to develop value-added and differentiated products and services because their continued profitability in a highly competitive marketplace depends on it. Utilities that face no competition have little incentive to innovate as their customers are held captive, without a choice of providers. It is undeniable that consumers (large and small) in restructured markets have greater access to innovative and integrated products and services such as like peak-time rebates, time-of-use, pre-paid, free

<sup>1</sup>

RESA's members include: AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison Solutions; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

January 17, 2014

Page Two

weekends, smart thermostats, on-site generation with net metering, and a wide-variety of renewable energy options, just to name a few than do customers where there are no competitive supply options.

The Commission's goal of increasing its understanding of technological advancements in energy is important, and the planned workshops should achieve that objective. However, bringing these innovations to the marketplace so consumers can choose to take an advantage of them, RESA holds that can only be accomplished in meaningful way through restructured markets. We look forward to revisiting the issue of establishing a competitive energy market – a pillar of innovation – in Arizona, hopefully as part of this important new proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim LoCasolo', is written over a circular stamp or seal.

Tim LoCasolo  
Director, Marketing & Regulatory Affairs

Original and 13 copies filed this 17<sup>th</sup> day of January, 2014  
and mailed to all parties on the Service List.