

ORIGINAL

OPEN MEETING ITEM



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MEMORANDUM

RECEIVED

Arizona Corporation Commission

DOCKETED

TO: THE COMMISSION

2014 APR 21 P 2:04

APR 21 2014

FROM: Utilities Division

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

DOCKETED BY

DATE: April 21, 2014

RE: TUCSON ELECTRIC POWER COMPANY – APPLICATION FOR APPROVAL OF
A RESIDENTIAL SUPER-PEAK TIME-OF-USE TARIFF (DOCKET NO. E-
01933A-12-0291)

Background

In Decision No. 73912 (April 16, 2013), the Commission approved a settlement agreement in Tucson Electric Power Company's ("TEP" or "Company") general rate case that provided for the establishment of new rates and charges. As part of that decision, the Commission ordered that TEP "...shall file on or before August 30, 2013, ...a Super-Peak Time-of Use Tariff". On August 26, 2013, TEP docketed a request for a two month extension of time, seeking authority to provide the mandated new tariff(s) by October 30, 2013. On August 30, 2013, the Commission Utilities Staff ("Staff") docketed a Memorandum, which among other things, recommended approval of TEP's requested time extension to file the mandated tariffs. The Staff Memorandum also recommended that the due date for the corresponding Staff Report and Recommended Order be extended to March 31, 2014. The Commission approved and ordered the requested time extensions in Decision No. 74163 (October 25, 2013).

On October 30, 2013, TEP submitted the instant application ("Application") that requests approval of the tariffs mandated by Decision No. 73912. Included in the Application is TEP's proposed Super-Peak, Time-of-Use Tariff that is the subject of this Memorandum.

On March 27, 2014, Staff filed a motion for Extension of Time, until June 30, 2014, to file its Staff Report and Proposed Order. The Administrative Law Judge ordered that any party objecting to the Staff Motion shall file a Response no later than April 11, 2014. No objections have been filed.

Proposed Residential Super Peak Time-of-Use Tariff (R-8)

TEP proposes a residential Super Peak Time-of-Use tariff that features a rate design whereby customers taking service under this tariff would pay a higher per kWh charge for electricity consumed during defined "super-peak" hours in exchange for a corresponding lower kWh charge during all other hours. Time-of-Use ("TOU") rates are typically designed to encourage and incent customers to shift load away from system peak load periods to other times of the day when the utility's marginal cost of generation is lower.

TEP presently offers two other residential TOU rates. The Residential TOU (R-80) tariff has a Summer On-Peak period from 2:00 p.m. until 8:00 p.m., Monday through Friday, and Winter On-Peak periods from 6:00 a.m. until 10:00 a.m. and 5:00 p.m. until 9:00 p.m., Monday through

THE COMMISSION

April 15, 2014

Page 2

Friday. The Special Residential Electric Service TOU Program (R-201B) is a rate schedule provided under TEP's energy efficiency program and is only available to residences that meet specific energy efficiency criteria¹. The R-201B rate has Summer and Winter On-Peak periods identical to the R-80 tariff.

In contrast to TEP's existing TOU rates, the TOU time periods specified in the Super Peak tariff are much more narrowly defined and are as follows:

- The Summer On-Peak period is 3:00 p.m. to 6:00 p.m., Monday through Friday (excluding Memorial Day, Independence Day, and Labor Day).
- The Winter On-Peak period is 3:00 p.m. to 6:00 p.m., Monday through Friday (excluding Thanksgiving Day, Christmas Day, and New Year's Day).
- All other hours are Off-Peak. If a holiday falls on Saturday, the preceding Friday is designated Off-Peak; if a holiday falls on Sunday, the following Monday is designated Off-Peak.

In exchange for the shorter On-Peak periods offered under the proposed Super Peak rate, customers would pay relatively higher energy charges for On-Peak and Off-Peak consumption. In the proposed Super Peak rate, both On-Peak and Off-Peak rates are calculated using an inclining-block rate design. Table I below compares the customer charges and energy charges between the existing R-80 TOU rate and the proposed Super Peak R-8 rate:

Table I
TEP Residential TOU Rates Comparison²

	Existing Residential TOU R-80	Proposed Super Peak TOU R-8
Monthly Customer Charge	\$11.50	\$11.50
Delivery Services – Energy³ (\$/kWh)		
Summer On-Peak	\$0.066800	First 1,000 kWh ⁴ : \$0.0971

¹ The R-201B rate schedule requires that the customer use exclusively the Company's service for all space heating and all water heating energy requirements. New homes must conform to the standards of the Company's approved efficiency program for new construction. Existing homes must conform to certain standards of the Company's approved efficiency program for existing homes.

² TEP's existing Special Residential Electric Service TOU Program (R-201B) is not included in this comparison because the energy efficiency requirements and resultant consumption patterns for customers taking service under the R-201B rate do not allow a direct comparison with the R-80 and proposed Super Peak R-8 rates.

³ Delivery Services – Energy is a bundled charge that includes: Local Delivery – Energy (Local Delivery and/or Distribution exclusive of Transmission / Ancillaries), Generation Capacity, Fixed Must-Run, Transmission and Ancillary Services.

		Over 1,000 kWh: \$0.1201
Summer Off-Peak	\$0.051800	First 1,000 kWh: \$0.0485 Over 1,000 kWh: \$0.0715
Winter On-Peak	\$0.056800	First 1,000 kWh: \$0.0891 Over 1,000 kWh: \$0.1121
Winter Off-Peak	\$0.041800	First 1,000 kWh: \$0.0385 Over 1,000 kWh: \$0.0615
Base Power (\$/kWh)		
Summer On-Peak	\$0.050669	First 1,000 kWh: \$0.0801 Over 1,000 kWh: \$0.0801
Summer Off-Peak	\$0.026679	First 1,000 kWh: \$0.0222 Over 1,000 kWh: \$0.0222
Winter On-Peak	\$0.032893	First 1,000 kWh: \$0.0402 Over 1,000 kWh: \$0.0402
Winter Off-Peak	\$0.027092	First 1,000 kWh: \$0.0205 Over 1,000 kWh: \$0.0205
PPFAC	Varies ⁵	Varies
Total Energy Rate⁶ (\$/kWh)		
Summer On-Peak	\$0.117469	First 1,000 kWh: \$0.1772 Over 1,000 kWh: \$0.2002

⁴ Based on total monthly metered kWh.

⁵ The Purchased Power and Fuel Adjustment Clause ("PPFAC") reflects increases or decreases in the cost to the Company for energy either generated or purchased above or below the base cost per kWh sold. The PPFAC varies over time pursuant to Rider-1 PPFAC.

⁶ The Total Energy Cost is presented for illustrative purposes and does not include the PPFAC.

Summer Off-Peak	\$0.078479	First 1,000 kWh: \$0.0707 Over 1,000 kWh: \$0.0937
Winter On-Peak	\$0.089693	First 1,000 kWh: \$0.1293 Over 1,000 kWh: \$0.1523
Winter Off-Peak	\$0.068892	First 1,000 kWh: \$0.0590 Over 1,000 kWh: \$0.0820

The proposed Super Peak TOU tariff would be applicable to all single-phase residential electric service in individual dwellings and individually metered apartments when all service is supplied at one point of delivery and energy is metered through one meter. TEP proposes that a customer electing to take service under this tariff must remain on the tariff's rate schedule for a minimum of one year.

As with TEP's existing R-80 TOU rate, the proposed Super Peak TOU tariff offers a discount to customers that own and operate electric vehicles. The discount is calculated as 5 percent of the Base Power Charge⁷ during the Off-Peak period and the Purchased Power and Fuel Adjustment Clause ("PPFAC"). Customers must provide documentation that verifies the electric vehicle is approved for operation on public streets and highways.

Staff's Analysis

Staff has reviewed the proposed Super Peak TOU tariff, the bill impact analysis, and associated work papers supplied by TEP. Staff finds that the proposed tariff comports with the Commission's directives in Decision No. 73912. Staff further finds that the proposed Super Peak TOU will be cost effective immediately for residential customers with very low consumption. Residential customers with average and slightly higher than average consumption would find the proposed rate cost effective, providing that they shift 2 to 8 percent of their consumption to off-peak hours. Above-average use customers shifting a larger portion of their consumption to off-peak periods could experience substantial savings. The proposed tariff is revenue neutral, providing customers do indeed shift a portion of their consumption to off-peak hours. In this way, the proposed Super Peak TOU tariff properly incents customer behavior.

Based on the Residential Load Shape information supplied by TEP, Staff recommends that the Super Peak period be from 4 to 7 pm, year-round, to provide customers an opportunity to shift consumption away from the highest peak times, while not penalizing usage during the later evening hours.

⁷ Both TEP's existing R-80 TOU tariff and the proposed R-8 Super Peak TOU tariff incorrectly state that the discount offered to owners of electric vehicles is a fraction of the "Base Fuel Charge". The correct statement should be that the discount is a fraction of the "Base Power Charge".

The instant application represents the first introduction of a Super Peak TOU tariff to TEP's rate schedule. Therefore, Staff recommends that customers be offered a 3-month trial period in which the customer can test the Super Peak TOU tariff to ensure that anticipated bill savings actual occur. Similarly, TEP may wish to adjust the Super Peak period hours based on the level of customer participation. Such adjustment of the Super Peak period hours shall require approval of the Commission.

Staff's Recommendations

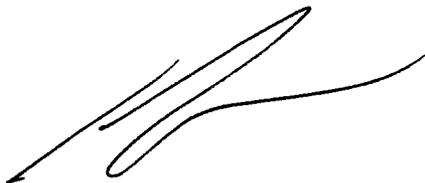
Staff recommends that TEP be directed to change the term "Base Fuel Charge" to "Base Power Charge" in the "Electric Vehicles" section of the tariff.

Staff further recommends that the Super Peak period be defined as being from 4:00 pm to 7:00 pm, year-round.

Staff further recommends that customers be offered a 3-month trial period in which to test the efficacy of the Super Peak TOU tariff, based on the customer's consumption patterns.

Staff further recommends that TEP be allowed to adjust the Super Peak period based on the level of customer participation, subject to approval by the Commission.

Staff further recommends that TEP's Residential Super Peak TOU Tariff (R-8) be approved as discussed herein.



Steven M. Olea
Director
Utilities Division

SMO:RBL:sms\RRM

ORIGINATOR: Rick Lloyd

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 BOB STUMP

Chairman

3 GARY PIERCE

Commissioner

4 BRENDA BURNS

Commissioner

5 BOB BURNS

Commissioner

6 SUSAN BITTER SMITH

Commissioner

7
8 IN THE MATTER OF TUCSON ELECTRIC)
9 POWER COMPANY'S APPLICATION FOR)
10 APPROVAL OF A RESIDENTIAL SUPER-)
11 PEAK TIME-OF-USE TARIFF)
12
13

DOCKET NO. E-01933A-12-0291

DECISION NO. _____

ORDER

14 Open Meeting
15 May 13, 2014 and May 14, 2014
16 Phoenix, Arizona

16 BY THE COMMISSION:

17 FINDINGS OF FACT

18 1. Tucson Electric Power Company ("TEP" or "Company") is certificated to provide
19 electric service as a public service corporation in Arizona.

20 Background

21 2. In Decision No. 73912 (April 16, 2013), the Arizona Corporation Commission
22 ("Commission") approved a settlement agreement in TEP's general rate case that provided for the
23 establishment of new rates and charges. As part of that decision, the Commission ordered that TEP
24 "...shall file on or before August 30, 2013, ...a Super-Peak Time-of-Use Tariff". On August 26, 2013,
25 TEP docketed a request for a two month extension of time, seeking authority to provide the
26 mandated new tariff(s) by October 30, 2013. On August 30, 2013, the Commission Utilities Staff
27 ("Staff") docketed a Memorandum which, among other things, recommended approval of TEP's
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1 requested time extension to file the mandated tariffs. The Staff Memorandum also recommended that
2 the due date for the corresponding Staff Report and Recommended Order be extended to March 31,
3 2014. The Commission approved and ordered the requested time extensions in Decision No. 74163
4 (October 25, 2013).

5 3. On October 30, 2013, TEP submitted the instant application ("Application") that
6 requests approval of the tariffs mandated by Decision No. 73912. Included in the Application is
7 TEP's proposed Super-Peak, Time-of-Use Tariff that is the subject of the Staff Memorandum.

8 4. On March 27, 2014, Staff filed a motion for Extension of Time, until June 30, 2014, to
9 file its Staff Report and Proposed Order. The Administrative Law Judge ordered that any party
10 objecting to the Staff Motion shall file a Response no later than April 11, 2014. No objections have
11 been filed.

12 **Proposed Residential Super Peak Time-of-Use Tariff (R-8)**

13 5. TEP proposes a residential Super Peak Time-of-Use tariff that features a rate design
14 whereby customers taking service under this tariff would pay a higher per kWh charge for electricity
15 consumed during defined "super-peak" hours in exchange for a corresponding lower kWh charge
16 during all other hours. Time-of-Use ("TOU") rates are typically designed to encourage and incent
17 customers to shift load away from system peak load periods to other times of the day when the
18 utility's marginal cost of generation is lower.

19 6. TEP presently offers two other residential TOU rates. The Residential TOU (R-80)
20 tariff has a Summer On-Peak period from 2:00 p.m. until 8:00 p.m., Monday through Friday, and
21 Winter On-Peak periods from 6:00 a.m. until 10:00 a.m. and 5:00 p.m. until 9:00 p.m., Monday
22 through Friday. The Special Residential Electric Service TOU Program (R-201B) is a rate schedule
23 provided under TEP's energy efficiency program and is only available to residences that meet specific
24 energy efficiency criteria.¹ The R-201B rate has Summer and Winter On-Peak periods identical to the
25 R-80 tariff.

26 _____
27 ¹The R-201B rate schedule requires that the customer use exclusively the Company's service for all space heating and all
28 water heating energy requirements. New homes must conform to the standards of the Company's approved efficiency
program for new construction. Existing homes must conform to certain standards of the Company's approved efficiency
program for existing homes.

7. In contrast to TEP's existing TOU rates, the TOU time periods specified in the Super Peak tariff are much more narrowly defined and are as follows:

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8. In exchange for the shorter On-Peak periods offered under the proposed Super Peak rate, customers would pay relatively higher energy charges for On-Peak and Off-Peak consumption. In the proposed Super Peak rate, both On-Peak and Off-Peak rates are calculated using an inclining-block rate design. Table I below compares the customer charges and energy charges between the existing R-80 TOU rate and the proposed Super Peak R-8 rate:

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⁴ Based on total monthly metered kWh.

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2			
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4	Winter On-Peak	\$0.056800	First 1,000 kWh: \$0.0891 Over 1,000 kWh: \$0.1121
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8			
9	Base Power (\$/kWh)		
10	Summer On-Peak	\$0.050669	First 1,000 kWh: \$0.0801 Over 1,000 kWh: \$0.0801
11			
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19	PPFAC	Varies ⁵	Varies
20	Total Energy Rate⁶ (\$/kWh)		
21	Summer On-Peak	\$0.117469	First 1,000 kWh: \$0.1772 Over 1,000 kWh: \$0.2002
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23	Summer Off-Peak	\$0.078479	First 1,000 kWh: \$0.0707 Over 1,000 kWh: \$0.0937
24			
25			
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⁶ The Total Energy Cost is presented for illustrative purposes and does not include the PPFAC.

1 2 3	Winter On-Peak	\$0.089693	First 1,000 kWh: \$0.1293 Over 1,000 kWh: \$0.1523
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6 9. The proposed Super Peak TOU tariff would be applicable to all single-phase
7 residential electric service in individual dwellings and individually metered apartments when all service
8 is supplied at one point of delivery and energy is metered through one meter. TEP proposes that a
9 customer electing to take service under this tariff must remain on the tariff's rate schedule for a
10 minimum of one year.

11 10. As with TEP's existing R-80 TOU rate, the proposed Super Peak TOU tariff offers a
12 discount to customers that own and operate electric vehicles. The discount is calculated as 5 percent
13 of the Base Power Charge⁷ during the Off-Peak period and the Purchased Power and Fuel Adjustment
14 Clause. Customers must provide documentation that verifies the electric vehicle is approved for
15 operation on public streets and highways.

16 Staff's Analysis

17 11. Staff has reviewed the proposed Super Peak TOU tariff, the bill impact analysis, and
18 associated work papers supplied by TEP. Staff finds that the proposed tariff comports with the
19 Commission's directives in Decision No. 73912. Staff further finds that the proposed Super Peak
20 TOU will be cost effective immediately for residential customers with very low consumption.
21 Residential customers with average and slightly higher than average consumption would find the
22 proposed rate cost effective, providing that they shift 2 to 8 percent of their consumption to off-peak
23 hours. Above-average use customers shifting a larger portion of their consumption to off-peak
24 periods could experience substantial savings. The proposed tariff is revenue neutral, providing
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28 ⁷ Both TEP's existing R-80 TOU tariff and the proposed R-8 Super Peak TOU tariff incorrectly state that the discount offered to owners of electric vehicles is a fraction of the "Base Fuel Charge". The correct statement should be that the discount is a fraction of the "Base Power Charge".

1 customers do indeed shift a portion of their consumption to off-peak hours. In this way, the
2 proposed Super Peak TOU tariff properly incents customer behavior.

3 12. Based on the Residential Load Shape information supplied by TEP, Staff has
4 recommended that the Super Peak period be from 4:00 pm to 7:00 pm, year-round, to provide
5 customers an opportunity to shift consumption away from the highest peak times, while not
6 penalizing usage during the later evening hours.

7 13. The instant application represents the first introduction of a Super Peak TOU tariff to
8 TEP's rate schedule. Therefore, Staff has recommended that customers be offered a 3-month trial
9 period in which the customer can test the Super Peak TOU tariff to ensure that anticipated bill savings
10 actually occur.

11 14. Similarly, TEP may wish to adjust the Super Peak period hours based on the level of
12 customer participation. Such adjustment of the Super Peak period hours shall require approval of the
13 Commission.

14 **Staff's Recommendations**

15 15. Staff has recommended that TEP be directed to change the term "Base Fuel Charge"
16 to "Base Power Charge" in the "Electric Vehicles" section of the tariff.

17 16. Staff has further recommended that the Super Peak period be defined as being from
18 4:00 pm to 7:00 pm, year-round.

19 17. Staff has further recommended that customers be offered a 3-month trial period in
20 which to test the efficacy of the Super Peak TOU tariff, based on the customer's consumption
21 patterns.

22 18. Staff has further recommended that TEP be allowed to adjust the Super Peak period
23 based on the level of customer participation, subject to approval by the Commission.

24 19. Staff has further recommended that TEP's Residential Super Peak TOU Tariff (R-8)
25 be approved as discussed herein.

26 **CONCLUSIONS OF LAW**

27 1. Tucson Electric Power Company is an Arizona public service corporation within the
28 meaning of Article XV, Section 2, of the Arizona constitution.

1 IT IS FURTHER ORDERED that Tucson Electric Power Company be allowed to adjust the
2 Super Peak period based on the level of customer participation, subject to approval by the
3 Commission.

4 IT IS FURTHER ORDERED that Tucson Electric Power shall file in Docket Control a
5 revised Residential Super-Peak Time-of-Use Tariff (R-8) consistent with the Decision in this case
6 within 15 days of the effective date of the Decision.

7 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

8

9 BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

10

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CHAIRMAN

COMMISSIONER

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14

COMMISSIONER

COMMISSIONER

COMMISSIONER

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16

IN WITNESS WHEREOF, I, JODI JERICH, 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 _____, 2014.

17

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21

JODI JERICH
EXECUTIVE DIRECTOR

22

23

DISSENT: _____

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25

DISSENT: _____

26

SMO:RBL:sms\RRM

27

28

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2 DOCKET NO. E-01933A-12-0291

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25 Ms. Janice M. Alward
26 Chief Counsel, Legal Division
Arizona Corporation Commission
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