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BEFORE THE ARIZONA CORPORATION COMMISSION

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PROPOSED RULEMAKING TO MODIFY THE
RENEWABLE ENERGY STANDARD RULES IN
ACCORDANCE WITH ACC DECISION NO. 74365

DOCKET NO. RE-00000C-14-0112

**REPLY COMMENTS OF TUCSON
ELECTRIC POWER COMPANY
AND UNS ELECTRIC, INC.**

ORIGINAL

Tucson Electric Power Company ("TEP") and UNS Electric, Inc. ("UNS Electric") (together, "Companies") submit their reply comments regarding seven concepts for modifying the Renewable Energy Standard Tariff ("REST") Rules that were proposed by the Utilities Division Staff ("Staff") of the Arizona Corporation Commission ("Commission").

The Companies have reviewed the comments and alternative proposals submitted in response to Staff's seven concepts. The Companies continue to support Staff's Track & Monitor proposal as the preferred option. Many of the other proposals were considered and rejected during the Track and Record proceeding. Track & Monitor will achieve the goal of fully capturing DE generation activity in a given utility's service territory when incentives are no longer necessary to encourage installations. As set forth in the Companies' initial comments, this approach would allow compliance with the REST Rules in the most cost-effective manner, with no additional costs for customers.

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RESPECTFULLY SUBMITTED this 28th day of April, 2014.

TUCSON ELECTRIC POWER COMPANY
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Original and 13 copies of the foregoing
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