

Arizona Corporation Commission

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OCT 17 2014

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Sun City's Advocate
Since 1963



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ORIGINAL

Docket Number – AU-00000C-14-0329

**Arizona Corporation Commission
Electric & Gas Utilities Extended Rate Design**

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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

October 16, 2014

Honorable Commissioners

The Sun City Home Owners Association (SCHOA) submits the following comments on behalf of the Sun City users of electric and gas utilities. It is understood by submitting the following comments SCHOA will be added to the Service List for this docket. The appropriate SCHOA contact information is listed at the end of this submission.

Upon receipt and review of the initial purpose and suggested process format surrounding this pre-filing procedure the clearest position is there are still a number of issues that remain unclear. Such as:

- Possible increase costs for Stakeholders, Company & Commission. How to exclude from customers?
- Projected vs Actual number deviations submitted for analysis – transition confusion?
- Extended timeline for overall determination impacts?

Conversely, there seem to be opportunities for process improvement and better decisions due to a more focused approach by screening out the clutter of other issues evident in the base rate case scenario.

The other interesting consequence of such a pre-filing process is the dramatic reduction of stress for the Commissioners relating to the “time clock” requirements. The pressure for “time constraint parameters” for the actual rate case would be reduced. Good or Bad? Not certain?

City of Volunteers

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SCHOA sees both positive and negative issues surrounding the pre-filing methodology as presented. Given the information received to date SCHOA takes a neutral position with the option to rescind if future information requires such.

Furthermore, copies of the attached list have also been mailed to the current Service List as noted on the ACC website as attached.

Respectfully submitted,



Greg Eisert

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