

OPEN MEETING



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MEMORANDUM

RECEIVED

Arizona Corporation Commission AZ CORP COMMISSION

TO: THE COMMISSION DOCKETED DOCKET CONTROL
FROM: Utilities Division OCT 21 2014 2014 OCT 21 PM 1 53

DATE: October 21, 2014

DOCKETED BY 

ORIGINAL

RE: AJO IMPROVEMENT COMPANY ELECTRIC DIVISION – APPLICATION FOR APPROVAL OF ITS 2015 AND 2016 RENEWABLE ENERGY STANDARD TARIFF IMPLEMENTATION PLAN. (DOCKET NO. E-01025A-14-0209)

Ajo Improvement Company (“Ajo”) is certificated to provide electric service as a public service corporation in the State of Arizona.

Background

On June 24, 2014, Ajo filed its 2015 and 2016 Renewable Energy Standard Tariff (“REST”) Implementation Plan (“2015-2016 Plan”) as required by Arizona Administrative Code (“A.A.C.”) R14-2-1801 through R14-2-1816. Ajo’s 2015 Plan includes a Plan for Eligible Renewable Energy Resources and a Plan for Distributed Renewable Energy Resources, with a request to resume collection of its Renewable Energy Standard and Tariff (“REST”) surcharge that was suspended by Decision No. 72894 on February 17, 2012. The 2015 Plan also includes a request for a two-year approval of its plan (2015 and 2016), with a waiver of the annual plan filing requirement in 2015 for the 2016 calendar year. Additionally, Ajo has requested that the waiver of the Distributed Energy requirement granted in Decision No. 73881 (May 8, 2013) continue for 2015 and 2016.

According to Ajo’s REST Compliance Report for 2013, a total of 400,000 kWh of renewable energy was procured in 2013. The procured renewable energy was less than Ajo’s total requirement of 467,319 kWh, based on retail sales of 11,682,965 kWh. However, Ajo used carryover renewable energy credits (“RECs”) from previous years to fulfill the rest of the Renewable Energy requirement. The procured renewable energy originated from RECs generated by Tucson Electric Power Company’s (“TEP”) landfill gas operation. The RECs were purchased from TEP by Ajo’s sister company, Morenci Water & Electric Company (“Morenci”), on behalf of Ajo, and were sold to Ajo at Morenci’s cost. Ajo has indicated that it anticipates purchasing additional RECs to meet its 2015 and 2016 total Annual Renewable Energy Requirement.

In 2012 Ajo reported that it awarded incentives for the installation of three photovoltaic (“PV”) solar power systems with a combined total capacity of 6.2 kW, and an estimated total annual output of 10,800 kWh. These installations are the first distributed generation systems installed in Ajo’s service territory since the inception of the REST Rules. Although Ajo plans to meet its total Renewable Energy Requirement for 2015 and 2016, Ajo will not meet the portion of its total annual

Renewable Energy Requirement dealing with distributed renewable energy pursuant to A.A.C. R14-2-1805.

The 2015-2016 REST Plan

Based on estimated annual kWh sales of approximately 12,500,000 in 2015 and 2016, Ajo anticipates that its total Annual Renewable Energy Requirement, pursuant to A.A.C. R14-2-1804 will be approximately 625,000 kWh in 2015 and 750,000 kWh in 2016. Ajo further anticipates that its Distributed Renewable Energy Requirement, pursuant to A.A.C. R14-2-1805, will be approximately 187,500 kWh in 2015 and 225,000 kWh in 2016.

Ajo's 2015-2016 Plan is largely unchanged from previous years. Ajo proposes to resume collection of the \$0.004988 per kWh REST surcharge and maintain existing incentive rates and collection caps. The proposed incentive rates and collection caps are further discussed in the following section of this report.

According to Ajo, it serves approximately 1,027 customers (843 residential customers, 183 non-residential customers, and 1 resale customer). Ajo states that many of its customers are retirees or on fixed incomes. Ajo's service territory is remote and approximately one square mile in area. Ajo does not anticipate much growth in the future. Therefore, the funds collected to meet the REST rules will be limited primarily to existing customers.

Distributed Renewable Energy Resources

Ajo would continue to offer incentive payments to customers to install Distributed Renewable Energy Resources, pursuant to A.A.C. R14-2-1809. Eligible renewable energy technologies listed in the 2015-2016 Plan include photovoltaic systems, solar space cooling, non-residential solar water heating and space cooling, small residential solar water heating, small residential solar space heating, biomass/biogas cooling, non-residential solar daylight and small wind generators. Incentive payments are one-time, up-front payments based on a 20-year REC agreement and will be determined based on system capacity and/or estimated annual kWh production. The maximum incentive amount per project is capped at 60 percent of system costs (including financing) or \$11,000. Ajo intends to continue to distribute incentives on a first-come, first-served basis, with an equal allocation of incentives between residential and non-residential applicants.

The incentive amounts proposed in the 2015-2016 Plan are unchanged from 2013 amounts, and are as follows:

**Table I
Incentives for Distributed Renewable Energy Resources**

System Type	Proposed 2015-2016 Incentives
Biomass/Biogas (Electric, Thermal, Cooling)	To be determined ("TBD")
Biomass/Biogas CHP (Electric, Thermal)	TBD
Daylighting	\$0.20 / kWh
Geothermal (Electric)	\$0.50 / Watt

THE COMMISSION

October 21, 2014

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& Integration							
Distributed Energy -	\$310,436	\$375,256	\$440,077	\$504,898	\$569,719	\$2,200,386	
Subtotal							
Total	\$331,124	\$399,881	\$468,730	\$537,398	\$606,157	\$2,343,290	

Ajo's budgets for 2015 and 2016 include more than \$300,000 a year in incentives for distributed renewable energy resources. However, Ajo states that this budget has not been used to calculate the Renewable Energy Standards Surcharge ("RESS"). Rather, the budget is submitted to demonstrate the level of funding required to meet the Distributed Renewable Energy Requirement.

On February 17, 2012, in Decision No. 72894, the Commission ordered Ajo to suspend collection of the RESS. Historically, Ajo had collected a RESS of \$0.004988 per kWh, which until its suspension led to an over-collection relative to incentive demand. Ajo in its 2015-2016 Plan proposes to resume collection of the RESS with the following caps:

- \$1.05 per month for each residential customer;
- \$39.00 per month for each non-residential customer;
- \$117.00 per month for each non-residential customer with demand over 3 MW per month for three consecutive months

Based on its current customer census, Ajo estimates that it would annually collect between \$20,000 and \$22,000 from customers through the RESS in 2015 and 2016. Ajo states that the RESS may provide sufficient funding for Ajo to meet its REST Rule requirements through the purchase of grid-tied Eligible Renewable Energy Resources in 2015 and 2016. However, this level of funding will not be sufficient to meet the annual Distributed Renewable Energy Requirement.

Ajo states that it does not believe that raising the RESS rates or monthly caps is necessary or appropriate at this time as there has been little interest from customers to install distributed renewable generation on customer premises. Ajo states that it would file to amend the RESS if and when customer interest is at a level warranting a higher collection rate.

Ajo has collected a relatively large amount of REST funds over the past several years but has not been able to award these funds as incentives due to the lack of customer demand. Ajo states that it had a 2013 year-end "carryover" of REST funds of approximately \$15,325. However, because Ajo filed its 2015-2016 REST plan before it had a chance to procure RECs for its 2014 REST requirement, Ajo believes the majority of these funds will be depleted by 2015. Based on the small amount of projected carryover compared with Ajo's 2015-2016 Rest Plan obligations, Staff recommends that Ajo be directed to reinstate the RESS for 2015 and 2016 but at a lower rate of \$0.004 per kWh, beginning on January 1, 2015. Staff further recommends the following 2015-2016 REST Plan budget for Ajo.

**Table III
 Staff Proposed Budget**

	2015 Ajo	2016 Ajo	2015 Staff	2016 Staff
Renewable Energy Resources				
Total Renewable Energy Prospective Procurement (Eligible Renewable Resources)	\$19,688	\$23,625	\$19,688	\$23,625
Utility-Owned Systems	0	0	0	0
Administration, Implementation, Commercialization & Integration	\$1,000	\$1,000	\$1,000	\$1,000
Renewable Energy Subtotal	\$20,688	\$24,625	\$20,688	\$24,625
Distributed Renewable Energy Resources				
Incentives	\$305,436	\$370,256	0	0
Customer Self-Directed Option	0	0	0	0
Administration, Implementation, Commercialization & Integration	\$5,000	\$5,000	\$1,000	\$1,000
Distributed Energy Subtotal	\$310,436	\$375,256	\$1,000	\$1,000
TOTAL	\$334,124	\$399,881	\$21,688	\$25,625

Under Staff's proposed 2015-2016 budget, all carryover funds remaining after Ajo's purchase of RECs would be available for award as incentives, should customer demand for these incentives materialize. Additionally, Staff believes the monies collected through the RESS will allow Ajo to procure the RECs needed to comply with the REST standard in 2015 and 2016. Based on the lack of customer demand for incentives in prior years, Staff recommends reducing Ajo's incentive budgets for 2015 and 2016 from \$305,436/\$370,256 to \$0. However, if monies collected through the RESS end up being higher than anticipated, these monies would also be available for award as incentives. If no customer demand for incentives materializes, Ajo can apply carryover funds towards future years' Renewable Energy Requirements.

Staff recommends that Ajo be granted a two-year waiver from compliance with the Distributed Renewable Energy Requirement, given Ajo's unique customer profile and the lack of customer demand for incentives.

Tariffs and Plan Schedule

Ajo has stated that because there have been only three applications submitted for incentives for eligible distributed renewable energy resources since the inception of its REST program, increasing the RESS surcharge and monthly caps is not justified at this time. In addition, Ajo states that any unused funds collected would continue to be rolled over to help fund future years' REST requirements. Therefore, Ajo proposes that its Distributed Renewable Energy Resource incentives, Customer Self-Directed Renewable Energy Option tariff, and Renewable Energy Standard Surcharge tariff should remain in effect until further order of the Commission.

Recommendations

Staff recommends that Ajo's two year REST Implementation Plan for 2015 and 2016 be approved and modified as discussed herein.

Staff further recommends that Ajo reinstate collection of the RESS for 2015 and 2016 at a lower rate of \$0.004 per kWh, beginning January 1, 2015.

Staff further recommends that Ajo be ordered to adopt Staff's proposed 2015 and 2016 REST Plan Budget.

Staff further recommends that Ajo be granted a two-year waiver from compliance with the Distributed Renewable Energy Requirement.

Staff further recommends that Ajo file its RESS tariff in compliance with the Decision in this case within 15 days of the effective date of the Decision.

Staff further recommends that Ajo, in its REST Compliance Report, include a running total of carryover REC's and indicate when these carryover RECs are used to fulfill its yearly requirement.

Staff further recommends that Ajo file its next REST Implementation Plan on or before July 1, 2016, as dictated by A.A.C. R14-2-1813.



Steven M. Olea
Director
Utilities Division

SMO:EMV:sms\CHH

ORIGINATOR: Eric Van Epps

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BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP
Chairman
GARY PIERCE
Commissioner
BRENDA BURNS
Commissioner
BOB BURNS
Commissioner
SUSAN BITTER SMITH
Commissioner

IN THE MATTER OF THE APPLICATION)
OF AJO IMPROVEMENT COMPANY)
ELECTRIC DIVISION – FOR APPROVAL)
OF ITS 2015 AND 2016 RENEWABLE)
ENERGY STANDARD TARIFF)
IMPLEMENTATION PLAN)

DOCKET NO. E-01025A-14-0209
DECISION NO. _____
ORDER

Open Meeting
November 5 and 6, 2014
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. Ajo Improvement Company (“Ajo”) is certificated to provide electric service as a public service corporation in the State of Arizona.

Background

2. On June 24, 2014, Ajo filed its 2015 and 2016 Renewable Energy Standard Tariff (“REST”) Implementation Plan (“2015-2016 Plan”) as required by Arizona Administrative Code (“A.A.C.”) R14-2-1801 through R14-2-1816. Ajo’s 2015 Plan includes a Plan for Eligible Renewable Energy Resources and a Plan for Distributed Renewable Energy Resources, with a request to resume collection of its Renewable Energy Standard and Tariff (“REST”) surcharge that was suspended by Decision No. 72894 on February 17, 2012. The 2015 Plan also includes a request for a two-year approval of its plan (2015 and 2016), with a waiver of the annual plan filing requirement in 2015 for

...

1 the 2016 calendar year. Additionally, Ajo has requested that the waiver of the Distributed Energy
2 requirement granted in Decision No. 73881 (May 8, 2013) continue for 2015 and 2016.

3 3. According to Ajo's REST Compliance Report for 2013, a total of 400,000 kWh of
4 renewable energy was procured in 2013. The procured renewable energy was less than Ajo's total
5 requirement of 467,319 kWh, based on retail sales of 11,682,965 kWh. However, Ajo used carryover
6 RECs from previous years to fulfill the rest of the Renewable Energy requirement. The procured
7 renewable energy originated from renewable energy credits ("RECs") generated by Tucson Electric
8 Power Company's ("TEP") landfill gas operation. The RECs were purchased from TEP by Ajo's
9 sister company, Morenci Water & Electric Company ("Morenci"), on behalf of Ajo, and were sold to
10 Ajo at Morenci's cost. Ajo has indicated that it anticipates purchasing additional RECs to meet its
11 2015 and 2016 total Annual Renewable Energy Requirement.

12 4. In 2012 Ajo reported that it awarded incentives for the installation of three
13 photovoltaic ("PV") solar power systems with a combined total capacity of 6.2 kW, and an estimated
14 total annual output of 10,800 kWh. These installations are the first distributed generation systems
15 installed in Ajo's service territory since the inception of the REST Rules. Although Ajo plans to meet
16 its total Renewable Energy Requirement for 2015 and 2016, Ajo will not meet the portion of its total
17 annual Renewable Energy Requirement dealing with distributed renewable energy pursuant to A.A.C.
18 R14-2-1805.

19 The 2015-2016 REST Plan

20 5. Based on estimated annual kWh sales of approximately 12,500,000 kWh in 2015 and
21 2016, Ajo anticipates that its total Annual Renewable Energy Requirement, pursuant to A.A.C. R14-2-
22 1804 will be approximately 625,000 kWh in 2015 and 750,000 kWh in 2016. Ajo further anticipates
23 that its Distributed Renewable Energy Requirement, pursuant to A.A.C. R14-2-1805, will be
24 approximately 187,500 kWh in 2015 and 225,000 kWh in 2016.

25 6. Ajo's 2015-2016 Plan is largely unchanged from previous years. Ajo proposes to
26 resume collection of the \$0.004988 per kWh REST surcharge and maintain existing incentive rates and
27 collection caps.

28 ...

1 7. According to Ajo, it serves approximately 1,027 customers (843 residential customers,
2 183 non-residential customers, and 1 resale customer). Ajo states that many of its customers are
3 retirees or on fixed incomes. Ajo's service territory is remote and approximately one square mile in
4 area. Ajo does not anticipate much growth in the future. Therefore, the funds collected to meet the
5 REST rules will be limited primarily to existing customers.

6 Distributed Renewable Energy Resources

7 8. Ajo would continue to offer incentive payments to customers to install Distributed
8 Renewable Energy Resources, pursuant to A.A.C. R14-2-1809. Eligible renewable energy technologies
9 listed in the 2015-2016 Plan include photovoltaic systems, solar space cooling, non-residential solar
10 water heating and space cooling, small residential solar water heating, small residential solar space
11 heating, biomass/biogas cooling, non-residential solar daylight and small wind generators. Incentive
12 payments are one-time, up-front payments based on a 20-year REC agreement and will be determined
13 based on system capacity and/or estimated annual kWh production. The maximum incentive amount
14 per project is capped at 60 percent of system costs (including financing) or \$11,000. Ajo intends to
15 continue to distribute incentives on a first-come, first-served basis, with an equal allocation of
16 incentives between residential and non-residential applicants.

17 9. The incentive amounts proposed in the 2015-2016 Plan are unchanged from 2013
18 amounts, and are as follows:

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Table I
Incentives for Distributed Renewable Energy Resources

System Type	Proposed 2015-2016 Incentives
Biomass/Biogas (Electric, Thermal, Cooling)	To be determined ("TBD")
Biomass/Biogas CHP (Electric, Thermal)	TBD
Daylighting	\$0.20 / kWh
Geothermal (Electric)	\$0.50 / Watt
Geothermal (Thermal)	\$1.00 / Watt
Hydroelectric	TBD
Small Wind	\$2.50 / Watt AC
Solar Electric - Residential Solar Electric - Non-Residential	\$3.50 / Watt DC for all residential and non-residential systems.
Solar Space Cooling	TBD
Non-Residential Solar Water Heating / Space Heating	TBD
Residential Solar Water Heating / Space Heating	\$0.75 / kWh for projected first year savings only.
Non-Residential Pool Heating	TBD

10. Amounts noted as "TBD" are for technologies that require the applicant to submit an engineering report from a licensed, professional engineer that includes anticipated energy savings and the designated output for the system. Ajo would then review the submission to validate anticipated energy savings and set a project-specific incentive based on the anticipated energy savings.

11. Any customers paying tariff funds of at least \$25,000 annually for any number of related accounts or services within Ajo's service territory are eligible for the "Customer Self-Directed Renewable Energy Option", as codified in A.A.C. R14-2-1809. Ajo states that it does not have, nor anticipates having any customers that would qualify for the Self-Direction Option. Therefore, Ajo is proposing a zero budget for this option.

12. Ajo has submitted the following proposed REST budget:

Table II

	2015	2016	2017	2018	2019	5-Year Total
Renewable Energy Resources						
Total Energy - Prospective Procurement (Eligible Renewable Resources)	\$19,688	\$23,625	\$27,653	\$31,500	\$35,438	\$137,904
Utility - Owned Systems	0	0	0	0	0	0

1	Administration, Implementation, Commercialization & Integration	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$5,000
2	Renewable Energy - Subtotal	\$20,688	\$24,625	\$28,653	\$32,500	\$36,438	\$142,904
3	Distributed Renewable Energy Resources						
3	Incentives	\$305,436	\$370,256	\$435,077	\$499,898	\$564,719	\$2,175,386
4	Customer Self-Directed Renewable Energy Option	0	0	0	0	0	0
5	Administration, Implementation, Marketing & Outreach, Commercialization & Integration	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000	\$25,000
6	Distributed Energy - Subtotal	\$310,436	\$375,256	\$440,077	\$504,898	\$569,719	\$2,200,386
7							
8	Total	\$331,124	\$399,881	\$468,730	\$537,398	\$606,157	\$2,343,290

9 13. Ajo's budgets for 2015 and 2016 include more than \$300,000 a year in incentives for
10 distributed renewable energy resources. However, Ajo states that this budget has not been used to
11 calculate the Renewable Energy Standards Surcharge ("RESS"). Rather, the budget is submitted to
12 demonstrate the level of funding required to meet the Distributed Renewable Energy Requirement.

13 14. On February 17, 2012 in Decision No. 72894, the Commission ordered Ajo to
14 suspend collection of the RESS. Historically, Ajo had collected a RESS of \$0.004988 per kWh, which
15 until its suspension led to an over-collection relative to incentive demand. Ajo in its 2015-2016 Plan
16 proposes to resume collection of the RESS with the following caps:

- 17 • \$1.05 per month for each residential customer;
- 18 • \$39.00 per month for each non-residential customer;
- 19 • \$117.00 per month for each non-residential customer with demand over 3 MW per
20 month for three consecutive months.

21 15. Based on its current customer census, Ajo estimates that it would annually collect
22 between \$20,000 and \$22,000 from customers through the RESS in 2015 and 2016. Ajo states that the
23 RESS may provide sufficient funding for Ajo to meet its REST Rule requirements through the
24 purchase of grid-tied Eligible Renewable Energy Resources in 2015 and 2016. However, this level of
25 funding will not be sufficient to meet the annual Distributed Renewable Energy Requirement.

26 16. Ajo states that it does not believe that raising the RESS rates or monthly caps is
27 necessary or appropriate at this time as there has been little interest from customers to install

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1 distributed renewable generation on customer premises. Ajo states that it would file to amend the
2 RESS if and when customer interest is at a level warranting a higher collection rate.

3 17. Ajo has collected a relatively large amount of REST funds over the past several years
4 but has not been able to award these funds as incentives due to the lack of customer demand. Ajo
5 states that it had a 2013 year-end "carryover" of REST funds of approximately \$15,325. However,
6 because Ajo filed its 2015-2016 REST plan before it had a chance to procure RECs for its 2014 REST
7 requirement, Ajo believes that the majority of these funds will be depleted by 2015. Based on the small
8 amount of projected carryover compared with Ajo's 2015-2016 Rest Plan obligations, Staff has
9 recommended that Ajo be directed to reinstate the RESS for 2015 and 2016 but at a lower rate of
10 \$0.004 per kWh, beginning on January 1, 2015. Staff has further recommended the following 2015-
11 2016 REST Plan budget for Ajo.

12 **Table III**
13 **Staff Proposed Budget**

	2015 Ajo	2016 Ajo	2015 Staff	2016 Staff
Renewable Energy Resources				
Total Renewable Energy Prospective Procurement (Eligible Renewable Resources)	\$19,688	\$23,625	\$19,688	\$23,625
Utility-Owned Systems	0	0	0	0
Administration, Implementation, Commercialization & Integration	\$1,000	\$1,000	\$1,000	\$1,000
Renewable Energy Subtotal	\$20,688	\$24,625	\$20,688	\$24,625
Distributed Renewable Energy Resources				
Incentives	\$305,436	\$370,256	0	0
Customer Self-Directed Option	0	0	0	0
Administration, Implementation, Commercialization & Integration	\$5,000	\$5,000	\$1,000	\$1,000
Distributed Energy Subtotal	\$310,436	\$375,256	\$1,000	\$1,000
TOTAL	\$334,124	\$399,881	\$21,688	\$25,625

18 18. Under Staff's proposed 2015-2016 budget, all carryover funds remaining after Ajo's
19 purchase of RECs would be available for award as incentives, should customer demand for these
20 incentives materialize. Additionally, Staff believes the monies collected through the RESS will allow
21 Ajo to procure the RECs needed to comply with the REST standard in 2015 and 2016. Based on the
22 lack of customer demand for incentives in prior years, Staff recommends reducing Ajo's incentive
23 budgets for 2015 and 2016 from \$305,436/\$370,256 to \$0. However, if monies collected through the
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1 RESS end up being higher than anticipated, these monies would also be available for award as
2 incentives. If no customer demand for incentives materializes, Ajo can apply carryover funds towards
3 future years' Renewable Energy Requirements.

4 19. Staff has further recommended that Ajo be granted a two-year waiver from
5 compliance with the Distributed Renewable Energy Requirement given Ajo's unique customer profile
6 and the lack of customer demand for incentives.

7 Tariffs and Plan Schedule

8 20. Ajo has stated that because there have been only three applications submitted for
9 incentives for eligible distributed renewable energy resources since the inception of its REST program,
10 increasing the RESS and monthly caps is not justified at this time. In addition, Ajo states that any
11 unused funds collected would continue to be rolled over to help fund future years' REST
12 requirements. Therefore, Ajo proposes that its Distributed Renewable Energy Resource incentives,
13 Customer Self-Directed Renewable Energy Option tariff, and Renewable Energy Standard Surcharge
14 tariff should remain in effect until further order of the Commission.

15 Recommendations

16 21. Staff has recommended that Ajo's two year REST Implementation Plan for 2015 and
17 2016 be approved and modified as discussed herein.

18 22. Staff has further recommended that Ajo reinstate collection of the RESS for 2015 and
19 2016 at a lower rate of \$0.004 per kWh, beginning January 1, 2015.

20 23. Staff has further recommended that Ajo be ordered to adopt Staff's proposed 2015
21 and 2016 REST Plan Budget.

22 24. Staff has further recommended that Ajo be granted a two-year waiver from
23 compliance with the Distributed Renewable Energy Requirement.

24 25. Staff has further recommended that Ajo file its RESS tariff in compliance with the
25 Decision in this case within 15 days of the effective date of the Decision.

26 26. Staff has further recommended that Ajo, in its REST Compliance Report, include a
27 running total of carryover REC's and indicate when these carryover RECs are used to fulfill its yearly
28 requirement.

1 IT IS FURTHER ORDERED that Ajo Improvement Company shall in its REST Compliance
2 Reports, include a running total of carryover RECs and indicate when these carryover RECs are used
3 to fulfill its yearly requirement.

4 IT IS FURTHER ORDERED that Ajo Improvement Company shall file its RESS tariff in
5 compliance with the Decision in this case within 15 days of the effective date of the Decision.

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

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8 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

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10 _____
CHAIRMAN COMMISSIONER

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13 _____
COMMISSIONER COMMISSIONER COMMISSIONER

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15 IN WITNESS WHEREOF, I, JODI JERICH, Executive
16 Director of the Arizona Corporation Commission, have
17 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.

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20 _____
JODI JERICH
EXECUTIVE DIRECTOR

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22 DISSENT: _____

23 DISSENT: _____

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25 SMO:EMV:sms\CHH

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1 SERVICE LIST FOR: Ajo Improvement Company
2 DOCKET NO. E-01025A-14-0209

3 Mr. Jason Gellman
4 Roshka DeWulf & Patten, PLC
5 One Arizona Center
6 400 E. Van Buren St. - 800
7 Phoenix, Arizona 85004

8 Mr. Steven M. Olea
9 Director, Utilities Division
10 Arizona Corporation Commission
11 1200 West Washington Street
12 Phoenix, Arizona 85007

13 Ms. Janice M. Alward
14 Chief Counsel, Legal Division
15 Arizona Corporation Commission
16 1200 West Washington Street
17 Phoenix, Arizona 85007

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