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BEFORE THE ARIZONA CORPORATION C...

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COMMISSIONER

Arizona Corporation Commission

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ARIZONA CORPORATION COMMISSION
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IN THE MATTER OF THE COMMISSION'S
INQUIRY INTO CONSIDERATION OF
DEVELOPING PROCEDURES FOR RATE
CASES OR OTHER UTILITY SPECIFIC
APPLICATION PROCESSES IN ORDER TO
STUDY AND CONSIDER RATE DESIGN
OPTIONS FOR ELECTRIC AND GAS
PUBLIC SERVICE CORPORATIONS.

Docket No. AU-00000C-14-0329

ORIGINAL

JOINT PARTIES' REPLY TO ARIZONA PUBLIC SERVICE COMPANY'S COMMENTS

The Residential Utility Consumer Office (RUCO), WESTERN RESOURCE ADVOCATES, SEIA, SWEEP, AARP, ARIZONA COMPETITIVE POWER ALLIANCE, SUN CITY HOMEOWNERS ASSOCIATION, and TASC, jointly offer the following reply comments in response to Arizona Public Service Company's (APS') comments on Staff's proposal regarding the optional process for Commission review of potential rate design changes. The parties offer these comments as a unified group to stress their objection to APS' proposal.

APS' proposal effectively separates the rate design discussion from the revenue requirement discussion and would result in two separate orders – one for rate design and one for revenue requirements. The parties object to APS' proposal because it:

- Hampers the parties and the Commission's ability to look at all of the moving parts at once

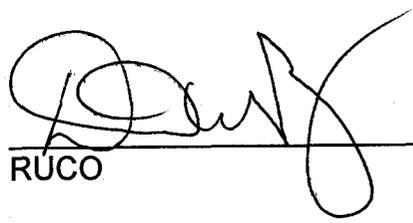
- 1 • Invites legal challenges
- 2 • Reduces flexibility to make needed changes later in the process
- 3 • Creates more work for the parties and the Commission than the traditional rate case
- 4 process
- 5 • Leads to a more costly proceeding
- 6 • Creates more confusion for ratepayers
- 7 • Hinders negotiations
- 8 • Reverses the traditional ratemaking process
- 9 • Guarantees appeals of the rate design order to preserve positions

10 For all of the above reasons, the aforementioned parties request that the Commission
11 reject APS' modified rate design proposal. APS would still be able to pursue the outcome it
12 seeks through more traditional methods.

13 RESPECTFULLY SUBMITTED this 31st day of October, 2014.

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RUCO

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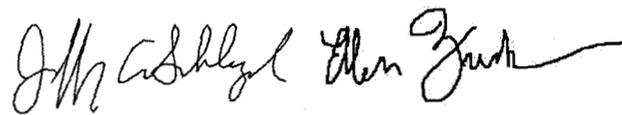
Western Resource Advocates

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SEIA
Giancarlo G. Estrada

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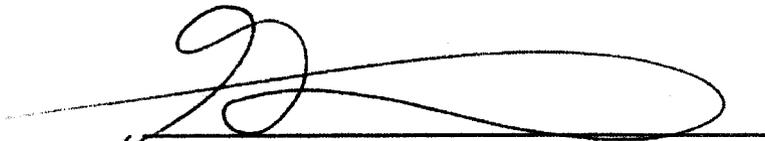
Jeff Schlegel & Ellen Zuckerman
Southwest Energy Efficiency Project (SWEET)

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Ralph Yerin

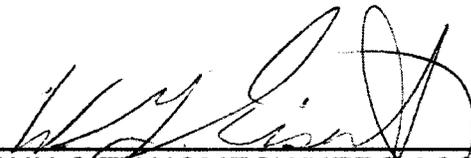
AARP

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Arizona Competitive Power Alliance

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SUN CITY HOMEOWNERS ASSOCIATION

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1 AN ORIGINAL AND THIRTEEN COPIES
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