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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission
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COMMISSIONER
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9 IN THE MATTER OF THE APPLICATION OF
10 ARIZONA PUBLIC SERVICE COMPANY
11 FOR A HEARING TO DETERMINE THE
12 FAIR VALUE OF THE UTILITY PROPERTY
13 OF THE COMPANY FOR RATEMAKING
14 PURPOSES, TO FIX A JUST AND
15 REASONABLE RATE OF RETURN
16 THEREON, AND TO APPROVE RATE
17 SCHEDULES DESIGNED TO DEVELOP
18 SUCH RETURN.

Docket No. E-01345A-11-0224

ORIGINAL

15 **RUCO'S RESPONSE TO THE AG-1 GENERATION SERVICE PROVIDERS' JOINT**
16 **MOTION TO EXTEND EXPERIMENTAL RATE RIDER SCHEDULE AG-1**

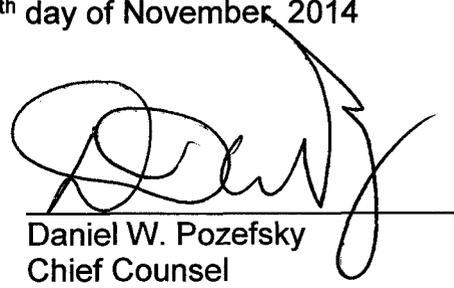
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18 The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby replies to the
19 AG-1 Generation Service Providers' Joint Motion to Extend Experimental Rate Rider
20 Schedule AG-1 as follows. RUCO has no objection to the extension as long as the
21 extension does not have an effect on the residential ratepayer's rates.

22 There currently is a docket open in the matter of APS' application for an Accounting
23 Order in its Four Corner's acquisition Docket No. E-01345A-11-0224. The parties are
24

1 awaiting a decision from the Administrative Law Judge and ultimately the Commission that
2 could result in a higher rate to the residential ratepayer as a result of the AG-1 rate
3 depending on how the Commission decides that matter. The main dispute in that case
4 concerns the position of Arizonans for Electric Choice and Competition ("AECC") and
5 Walmart who have recommended the expansion of the definition of "generation" in such a
6 way to effectively exclude all AG-1 customers from the entirety of the Four Corners'
7 Acquisition. If the AG-1 customers are excluded, ratepayer's rates in other classes
8 including residential will go up as even AECC's witness testified to in that matter. RUCO
9 disagrees with Walmart and AECC's expanded definition in that case.

10 If the Commission ultimately decides that case in a fashion where residential
11 ratepayer's current rates will increase, then RUCO would object to the AG-1 Generation
12 Service Providers' Joint Motion to Extend. Accordingly, RUCO cannot state a position with
13 certainty at this time, but can state that RUCO does not object to the Request provided it
14 does not impact the residential ratepayer's rates but does object if it does impact the
15 residential ratepayer's rates.

16 RESPECTFULLY SUBMITTED this 24th day of November, 2014

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19 
Daniel W. Pozefsky
Chief Counsel

20 AN ORIGINAL AND THIRTEEN COPIES
21 of the foregoing filed this 24th day of November
22 with:
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