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ARIZONA CORP COMMISSION
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ORIGINAL

IN THE MATTER OF RESOURCE PLANNING
AND PROCUREMENT.

Docket No. E-00000V-13-0070

**AEPCO'S COMMENTS ON IRP
ASSESSMENT**

GALLAGHER & KENNEDY, P.A.
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As requested at the November 7, 2014 IRP Workshop, AEPCO submits the attached comments in relation to the November 3, 2014 draft of the Assessment of the 2014 Integrated Resource Plans of the Arizona Electric Utilities.

RESPECTFULLY SUBMITTED this 26th day of November, 2014.

GALLAGHER & KENNEDY, P.A.

By Michael M. Grant

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Original and 13 copies filed this
26th day of November, 2014, with:

Docket Control
Arizona Corporation Commission
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Phoenix, Arizona 85007

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1 **Copies** of the foregoing delivered
this 26th day of November, 2014, to:

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**AEPCO Comments on the November 3, 2014 Draft of the Assessment
of the 2014 Integrated Resource Plans of the Arizona Utilities in
ACC Docket No. E-00000V-13-0070 (the "IRP Docket")**

AEPCO has reviewed the preliminary draft of the IRP assessment (the "Assessment") by *Global Energy and Water Consulting, LLC* and *Evans Power Consulting, Inc.* (the "Consultants"). AEPCO supports its conclusion that AEPCO's 2014 IRP filing satisfies the requirements of Decision No. 73884, which outlines AEPCO's IRP filing requirements.

We offer the following clarifications for review by the Consultants and ACC Staff.

- i. At page 76 of the Assessment, it states that "AEPCO does not provide a description of the tons of coal ash produced per generating unit in the 2013 Integrated Resource Planning Actual Data Filing nor the 2012 Integrated Resource Planning Actual Data Filing."

AEPCO does provide information related to actual coal ash production in the following locations:

Page 64 of the 2012 Demand- and Supply-Side Data Filing, filed on April 1, 2013, in the IRP Docket.

Page 61 of the 2013 Demand- and Supply-Side Data Filing, filed on April 1, 2014, in the IRP Docket.

- ii. Page 77 of the Assessment states that "Insofar as A.A.C. R14-2-703(B)(1)(r) relates to subsection D(1)(a), AEPCO does not provide a forecast for coal ash production."

AEPCO does provide information related to forecast coal ash production on page 55 of its 2014 Resource Planning Filing.