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February 10, 2015

ORIGINAL

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: Notice of Filing – Joint Comments of Tucson Electric Power and UNS Electric, Inc.
In the Matter of the Commissions ~~Integrated Resource Planning Docket No. E-00000J-13-0070~~ and Emerging Technologies-Docket No. E-00000J-13-0375

Pursuant to Commissioner Bob Burn's January 27, 2015 request for comments in the aboved-referenced Integrated Resource Planning and Emerging Techonologies dockets, Tucson Electric Power Company and UNS Electric, Inc. hereby submit the attached Joint Comments.

Sincerely,

Melissa Morales

Attachement
Original and 13 Copies Filed with
Docket Control

cc: Parties on Service List

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Tucson Electric Power Company and UNS Electric, Inc.

**Joint Response to Request for Comments on Integrated Resource Planning and Emerging Technologies
(Docket Nos. E-00000V-13-0070 and E-00000J-13-0375)**

Tucson Electric Power Company (“TEP”) and UNS Electric, Inc. (“UNSE”) (together, the “Companies”) hereby submit these joint comments in response to Commissioner Burns’ January 27, 2015 letter (the “Letter”) in these dockets.

The Companies agree that the current Integrated Resource Planning (“IRP”) process in Arizona could be improved by adopting some of the recommendations noted in Staff’s December 19, 2014 Assessment of the 2014 Integrated Resource Plans.

Specifically, the Companies would be supportive of the following modifications to the current IRP process:

- **IRP workshops hosted by Commission Staff and utilities.** These workshops could provide a formal opportunity for stakeholders to provide input earlier in each utility's planning process. The information from these workshops could help shape IRP assumptions and the final reports submitted by the utilities;
- **Leverage the IRP process with the ACC’s Biennial Transmission Assessments (“BTA”).** In their respective 2014 IRP reports, both TEP and UNSE included a separate chapter summarizing each Company’s long-term transmission plans based on the analysis performed in the BTA. The Companies’ IRPs also included an overview of how proposed transmission projects could influence long-term resource planning decisions; and
- **Include an evaluation of emerging grid technologies in the IRP.** The 2014 IRP reports for both TEP and UNSE provided a separate chapter on potential options for managing the long-term impacts of renewable energy on the grid, including storage technologies. TEP and UNSE support adding IRP reporting requirements that highlight the development of non-conventional grid resources such as smart grids, distribution voltage optimization, and other mechanisms that could improve the integration of higher levels of renewable resources.

The Companies look forward to discussing options for improvements to the IRP process at the upcoming workshop.