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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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COMMISSIONER

7
8 IN THE MATTER OF THE APPLICATION OF
9 ARIZONA PUBLIC SERVICE COMPANY
10 FOR A HEARING TO DETERMINE THE
11 FAIR VALUE OF THE UTILITY PROPERTY
12 OF THE COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN
THEREON, AND TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN.

Docket No. E-01345A-11-0224

13
14 **RUCO'S SUPPLEMENTAL RESPONSE TO JOINT MOTION TO EXTEND
15 EXPERIMENTAL RATE RIDER SCHEDULE AG-1**

16 The Residential Utility Consumer Office ("RUCO") hereby files its Supplemental
17 Response to Joint Motion to Extend AG-1 Rate Rider. RUCO is not a Joint Movant nor did
18 RUCO participate in any of the negotiations between the Joint Movants and APS. RUCO files
19 this Supplemental Response to its original response of November 24, 2014 (See attached
20 Exhibit 1) since the Commission has since issued its decision (Decision No 74876) in the Four
21 Corner's Rate Rider Application referenced in RUCO's original response and in response to
22 APS' recent Withdrawal of Opposition to Extend the AG-1 Rate and Request for Accounting
23 Deferral Order.

Arizona Corporation Commission
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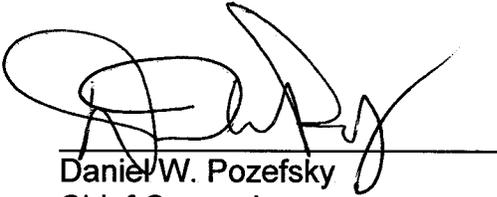
1 Simply stated, RUCO does not oppose the Joint Motion or Deferral Order request as
2 long as it has no effect, either immediate or in the long run on the rates of the residential class.
3 Since it is unclear from APS' withdrawal as well as the Joint Motion that residential ratepayers
4 will not be effected, RUCO urges the Commission to include the following or similar language
5 as part of its Decision:

6 IT IS FURTHER ORDERED that at no time shall any unrecovered generation costs,
7 deferred or otherwise, imputed to AG-1 customers be recovered through any class of
8 residential ratepayers.

9 With the above assurance, RUCO would not oppose the Joint Movant's request or APS'
10 request for a Deferral Order.

11 RESPECTFULLY SUBMITTED this 22nd day of June, 2015.

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Daniel W. Pozefsky
Chief Counsel

20 AN ORIGINAL AND THIRTEEN COPIES
21 of the foregoing filed this 22nd day
22 of June, 2015 with:

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EXHIBIT 1



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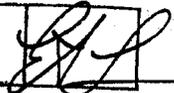
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15 **RUCO'S RESPONSE TO THE AG-1 GENERATION SERVICE PROVIDERS' JOINT**
16 **MOTION TO EXTEND EXPERIMENTAL RATE RIDER SCHEDULE AG-1**

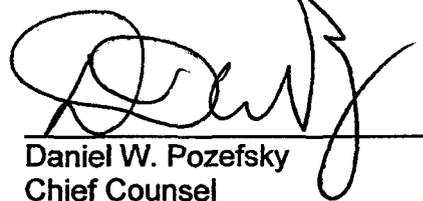
17
18 The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby replies to the
19 AG-1 Generation Service Providers' Joint Motion to Extend Experimental Rate Rider
20 Schedule AG-1 as follows. RUCO has no objection to the extension as long as the
21 extension does not have an effect on the residential 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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Daniel W. Pozefsky
Chief Counsel

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