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AZ CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

JUN 26 2015

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IN THE MATTER OF RESOURCE PLANNING AND
PROCUREMENT IN 2013 AND 2014.

Docket No. E-00000V-13-0070

**AEPCO'S COMMENTS TO
COMMISSIONER LITTLE'S
JUNE 16, 2015 LETTER**

GALLAGHER & KENNEDY, P.A.
2575 E. CAMELBACK ROAD
PHOENIX, ARIZONA 85016-9225
(602) 530-8000

Arizona Electric Power Cooperative, Inc. ("AEPCO") hereby submits its comments to Commissioner Doug Little's June 16, 2015 letter. In his letter, Commissioner Little suggests that the Commission extend the upcoming Integrated Resource Plan ("IRP") filing deadline, which is currently set for April 1, 2016 pursuant to Arizona Administrative Code R14-2-703. Commissioner Little has proposed a one-year extension to the IRP filing deadline to enable the Load Serving Entities to better incorporate into their IRPs the impact of the Environmental Protection Agency's ("EPA") final Clean Power Plan rule. In light of the potentially significant and time-sensitive resource changes that this impending rule may require for Arizona's energy portfolio, AEPCO supports Commissioner Little's proposal to extend the upcoming IRP deadline.

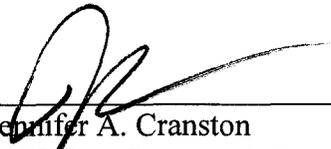
As the Commission is aware, following the EPA's release of the final Clean Power Plan rule, the Arizona Department of Environmental Quality ("ADEQ") will have one year (which may be extended or delayed under certain circumstances) to develop and submit a State Implementation Plan ("SIP"). It is currently anticipated that the EPA's final rule will be released

1 later this summer, conceivably giving ADEQ until September of 2016 to develop the SIP.
2 Therefore, assuming ADEQ completes the Arizona SIP by September 30, 2016, AEPCO should
3 have sufficient information and time to incorporate the impact of the EPA's rule and ADEQ's
4 SIP into its IRP by April 1, 2017.

5 AEPCO appreciates Commissioner Little's proactive approach to the IRP process and the
6 opportunity to provide comment on his proposal.

7 RESPECTFULLY SUBMITTED this 26th day of June, 2015.

8 GALLAGHER & KENNEDY, P.A.

9
10 By 
11 Jennifer A. Cranston
12 2575 East Camelback Road
13 Phoenix, Arizona 85016-9225
14 Attorneys for Arizona Electric Power
15 Cooperative, Inc.

16 **Original and 13 copies** filed this
17 26th day of June, 2015, with:

18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington Street
21 Phoenix, Arizona 85007

22 **Copies** of the foregoing delivered
23 this 26th day of June, 2015, to:

24 Commissioner Susan Bitter Smith, Chairman
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

1 Commissioner Bob Stump
Arizona Corporation Commission
2 1200 West Washington Street
Phoenix, Arizona 85007

3
4 Commissioner Bob Burns
Arizona Corporation Commission
1200 West Washington Street
5 Phoenix, Arizona 85007

6 Commissioner Doug Little
Arizona Corporation Commission
7 1200 West Washington Street
Phoenix, Arizona 85007

8
9 Commissioner Tom Forese
Arizona Corporation Commission
1200 West Washington Street
10 Phoenix, Arizona 85007

11 Steve Olea
Utilities Division
12 Arizona Corporation Commission
1200 West Washington Street
13 Phoenix, Arizona 85007

14 Rick Lloyd
Utilities Division
15 Arizona Corporation Commission
1200 West Washington Street
16 Phoenix, Arizona 85007

17 Janice Alward
Legal Division
18 Arizona Corporation Commission
1200 West Washington Street
19 Phoenix, Arizona 85007

20 Charles Hains
Legal Division
21 Arizona Corporation Commission
1200 West Washington Street
22 Phoenix, Arizona 85007

23

24

1 Lyn Farmer
Hearing Division
2 Arizona Corporation Commission
1200 West Washington Street
3 Phoenix, Arizona 85007

4 Dwight Nodes
Hearing Division
5 Arizona Corporation Commission
1200 West Washington Street
6 Phoenix, Arizona 85007

7 **Copies** of the foregoing mailed this
26th day of June, 2015, to:
8
9 Timothy Hogan
514 West Roosevelt
Phoenix, Arizona 85003
10
11 Michael Patten
Snell & Wilmer, L.L.P.
One Arizona Center
12 400 East Van Buren Street
Phoenix, Arizona 85004
13
14 Greg Patterson
Munger Chadwick
916 W. Adams – 3
15 Phoenix, Arizona 85007

16 Daniel Pozefsky
1110 West Washington, Suite 220
17 Phoenix, Arizona 85007

18 C. Webb Crockett
Patrick Black
19 Fennemore Craig, P.C.
2394 E. Camelback Road, Suite 600
20 Phoenix, Arizona 85016

21 Lisa Malagon
Arizona Public Service Company
22 Mail Station 9712
P. O. Box 53999
23 Phoenix, Arizona 85072

1 David Berry
Western Resource Advocates
2 P. O. Box 1064
Scottsdale, Arizona 85252-1064

3
4 Bradley Carroll
88 E. Broadway Blvd. MS HQE910
P. O. Box 711
5 Tucson, Arizona 85701

6 Jeff Schlegel
1167 W. Samalayuca Dr.
7 Tucson, Arizona 85704-3224

8
9 
10421-78/4868028

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11
12
13
14
15
16
17
18
19
20
21
22
23
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