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COMMISSIONERS

SUSAN BITTER SMITH, Chairman  
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2015 JUN 26 P 12: 39

AZ CORP COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission  
**DOCKETED**  
JUN 26 2015

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**ORIGINAL**

IN THE MATTER OF ARIZONA ELECTRIC  
POWER COOPERATIVE, INC.'S FILING OF  
RESOURCE PLANNING AND PROCUREMENT  
INFORMATION PER A.A.C. R14-2-701 *et seq.*  
FOR 2015 AND 2016.

Docket No. E-00000V-15-0094

**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   
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14 Attorneys for Arizona Electric Power  
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14 **Original and 13 copies** filed this  
15 26th day of June, 2015, with:

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