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Arizona Independent Scheduling Administrator Association

May 27, 2015

Attention: ACC Docket Control

Via Federal Express

Arizona Corporation Commission

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Re: Docket No. E-00000V-13-0070

Please find an original and 13 copies of the Arizona Independent Scheduling Administrator Association (AZISA) comment in support of Arizona Public Service Company's energy imbalance market filing, to be filed in the above Docket.

Enclosed is a self-addressed and stamped envelope to return a copy of the AZISA Comment date stamped to the Executive Director of the AZISA:

Vicki Sandler
Executive Director
Arizona Independent Scheduling Administrator's Association
14402 S. Canyon Dr.
Phoenix, Arizona 85048

Thank you,

Vicki Sandler
Executive Director, AZISA

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BEFORE THE ARIZONA CORPORATION COMMISSION

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**INTEGRATED RESOURCE PLANNING)
ENERGY IMBALANCE MARKET FILING)
BY ARIZONA PUBLIC SERVICE CO.)**

**Docket No. E-00000V-13-0070
COMMENT OF THE ARIZONA INDEPENDENT
SCHEDULING ADMINISTRATOR ASSC'N (AZISA)**

AZISA Background:

The Arizona Independent Scheduling Administrator Association (AZISA) is a non-profit Arizona Corporation formed in September 1998 to act as an independent electric transmission scheduling administrator. The AZISA is designed to "support the provision of comparable, non-discriminatory retail access to the Arizona transmission system to facilitate a robust and efficient competitive electric market in Arizona." (*Excerpt from: Arizona Ind. Scheduling Administrator Assoc. FERC Electric Tariff, Original Volume No. 11, Section 1, Superseding Substitute Sheet No. 4, effective December 15, 2001*). Arizona Administrative Code, Title 14, Ch.2, Article 16, Retail Electric Competition, R14-2-1609 (A) requires the "Affected Utilities" to provide "nondiscriminatory open access to transmission and distribution facilities to serve all customers. No preferences will be given to the monopoly utility's existing customers or one who chooses to be served by an Energy Service Provider (ESP). Use of the system is allocated on a pro-rata basis." This section A of the Rules is in place today and the AZISA is one possibility of ensuring this occurs, despite the fact that there is no active competition at the present.

Introduction

The purpose of this comment is to SUPPORT Arizona Public Service Company's (APS) letter submitted April 17, 2015, in the integrated resource planning docket, stating that APS believes it is in the best interests of its customers to participate in the Energy Imbalance Market (EIM) operated by the California Independent System Operator (CAISO). AZISA generally supports the stated benefits that an "EIM can reduce customer costs by reducing production costs due to improved access to cheaper generation across a broader geographic footprint." Also, "As renewable generation replaces more traditional ways of generating power, the needs of the grid are changing. New ways of operating and thinking about providing reliable and economic power are necessary to meet the challenges of an evolving grid. EIM represents one of these ways."

Thank you for the opportunity to comment.

RESPECTULLY SUBMITTED this 27th day of May, 2015.

A handwritten signature in black ink, appearing to read "Vicki Sandler", with a long, sweeping underline that extends to the right.

Vicki Sandler
Executive Director, AZISA

Original and 13 copies filed May 27,
2015, with:

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007