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ARIZONA CORPORATION COMMISSION

ORIGINAL

June 16, 2015

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AZ CORP COMMISSION
DOCKET CONTROL

RE: RESOURCE PLANNING AND PROCUREMENT IN 2016
Docket No.: E-00000V-13-0070

To the Parties in the Docket:

Under the Commission's current rules (specifically R14-2-703) Arizona's electric utilities will be required to file their next Integrated Resource Plans (IRPs) on April 1, 2016. Assembling an IRP is a time and resource intensive undertaking for the utilities. Given the extensive planning and forecasting necessary for the IRPs, the lead time necessary for their completion is extensive. Therefore in order to meet the April 1, 2016 deadline the utilities are necessarily working on their IRPs right now.

While I am sure the utilities are capable of meeting the April 1, 2016 deadline, the timing of the release of the EPA's final Clean Power Plan may make it sensible to delay the due date for the next IRPs. The EPA is likely to issue its final Clean Power Plan rule later this summer and the content of the final Clean Power Plan will significantly impact the utilities' IRPs. Given that no one knows what the final Clean Power Plan will require and that it will likely take at least several months to fully understand its requirements and the different strategies utilities could use to meet those requirements, it seems unlikely that any IRPs filed by April 1, 2016 would be able to completely incorporate the impact of the Clean Power Plan. In light of this, I believe the Commission should consider allowing a one-year delay for the next IRP filings, to April 1, 2017.

I want to emphasize that this proposal does not imply any support for or acceptance of the EPA's final Clean Power Plan. Regardless of what Arizona's response to the final Clean Power Plan will be, it will be beneficial to have a thorough understanding of the final plan incorporated into the next IRPs.

As I mentioned at the June 16, 2015 Staff Meeting, I would like to hear from the utilities, interested parties and stakeholders regarding this proposal. I would like the utilities, interested parties and stakeholders to file comments in this docket on the proposal by July 3, 2015.

Sincerely,

Doug Little
Commissioner
Arizona Corporation Commission

Arizona Corporation Commission

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Docketed June 16, 2015
Mailed June 16, 2016 to the Service List in Docket No. E-00000V-13-0070