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AZ CORP COMMISSION
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Arizona Corporation Commission
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July 2, 2015

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

RE: Resource Planning and Procurement in 2013 and 2014; Docket No. E-00000V-13-0070
Comments to Commissioners Doug Little's and Bob Burns' letters regarding IRP

Arizona Public Service Company ("APS") respectfully submits the following response to Commissioner Little's and Commissioner Burns' requests for comments regarding modifications to the Integrated Resource Plan ("IRP") process. APS would like to thank the Commissioners for the opportunity to discuss their proposals and appreciates how, under the Commission's leadership, utilities, stakeholders, Commission Staff and Commissioners have taken steps to develop more transparency and foster more open dialogue with each other regarding resource planning.

Commissioner Little has requested comments on extending the filing date for the utilities' next IRP to 2017. While APS does not anticipate needing additional time to prepare its 2016 IRP, APS understands the uncertainty regarding the final Clean Power Plan rules and the potential for substantial impacts on Arizona. As such, APS supports delaying the filing date to April of 2017.

Commissioner Burns has requested comments regarding changing the IRP filing cycle to every three years. Extending the filing cycle could allow additional time for analysis and potentially reduce the resource demands on the Commission and utilities for preparing and processing the IRPs. Alternatively, maintaining a two year filing cycle furthers the benefits of promoting collaboration and timeliness. APS would be interested in discussing how a three year filing cycle might be implemented, and how either a three year cycle, or continued modifications to the two year cycle, would enhance the dialogue and timeliness of information to improve the transparency that the Commission and Stakeholders have been requesting.

APS appreciates the Commission's interest in facilitating open communication and collaboration regarding resource planning and looks forward to continued dialogue regarding these issues.

Sincerely,

Gregory L. Bernosky

GB/kr

cc: Parties of Record

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