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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

- Susan Bitter Smith, Chairman
- Bob Stump
- Bob Burns
- Doug Little
- Tom Forese

AZ CORP COMMISSION
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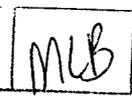
IN THE MATTER OF RESOURCE PLANNING
AND PROCUREMENT AND RESOURCE
PLANNING IN 2015 AND 2016

DOCKETS E-00000V-13-0070 and
Arizona Corporation Commission
~~E-00000V-15-0094~~

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Comments of Western Grid Group

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In response to Commissioner Little's letter dated June 16, 2015, and Commissioner Burn's June 19, 2015 letter seeking input on whether the schedule for resource planning should be delayed, Western Grid Group believes the current biennial schedule should be maintained for the following reasons:

The Integrated Resource Plans (IRP) provide the Commission and the public with critical information about long term resource (15 year) and shorter term action (three year) plans for the regulated utilities. The IRPs are the only comprehensive documents that provide an overall view of possible future resource scenarios and context for myriad decisions made by electric utilities. Delaying filing of IRPs by one year would mean that there would be a three-year gap in availability of public resource planning documents. Given the enormous amount of change in technology and innovation that has occurred in the electric sector in the past three years, and the expectation that significant change will continue, three years is too long to forgo public information or review by the Commission of utility plans.

Arizona's regulated utilities are required to submit IRPs on April 1, 2016. As the EPA is expected to publish the Clean Power Plan in August or September utilities would have seven or eight months after the rule is published to prepare their IRPs. If the EPA maintains the schedule in the proposed rule, the state will have to submit its compliance filing in August or September, 2016. Having IRPs submitted mid-point between the publishing of the rule and the filing of the state plan would provide information to

the Commission, the Arizona Department of Environmental Quality and the public, which would aid in decision-making. It should be recognized that the Clean Power Plan provides great flexibility to achieve carbon reductions (as proposed). It is anticipated that carbon reductions will also be achieved through non-utility programs. Thus, having definitive information about utility options and costs, as provided in IRPs, could help inform carbon reduction activities outside of utility jurisdictions.

We understand that Commissioners want to provide the utilities with adequate time to prepare IRPs that take into consideration the impacts of the Clean Power Plan. However, we find no compelling reason to delay the IRP process by an entire year or permanently change to a three year schedule. Indeed, we believe that the Commission is considering changes to the IRP process which will make it more robust and useful to the Commission, the public and utilities. While the Clean Power Plan will impact the IRP and vice versa, it is important for the Commission to maintain its independent process regardless of a federal rule.

Thank you for the opportunity to provide comments.

RESPECTFULLY SUBMITTED this 2nd day of July, 2015.

Amanda Ormond
Managing Director
Western Grid Group
7650 S. McClintock Drive
Ste 103-282
Tempe, Arizona 85284
asormond@msn.com