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AZ CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

OCT 2 2015

Attorneys for Intervenor-Applicants
IBEW Locals 387 & 769

**BEFORE THE ARIZONA
CORPORATION COMMISSION**

DOCKETED BY

Docket No. E-01345A-13-0248

IN THE MATTER OF THE
APPLICATION OF ARIZONA
PUBLIC SERVICE FOR APPROVAL
OF NET METERING COST SHIFT
SOLUTION.

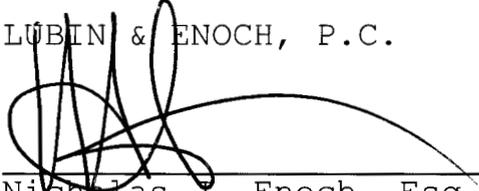
**INTERVENOR-APPLICANTS IBEW
LOCALS 387 AND 769'S: (1)
JOINDER IN "ARIZONA PUBLIC
SERVICE COMPANY'S MOTION TO
AMEND INTERLOCUTORY
ORDER"; and (2)
SUPPLEMENTAL COMMENT IN
SUPPORT OF THEIR PENDING
APPLICATION TO INTERVENE**

While not adopting or endorsing, nor rejecting, all of the commentary contained therein, Intervenor-Applicants Local Unions 387 and 769 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 387" and "IBEW Local 769") (collectively, "the IBEW Locals"), hereby notify the Commission that they fully support the relief sought by Arizona Public Service Company in its Motion to Amend Interlocutory Order dated September 25, 2015 (p. 4), to wit, "this proceeding would transition into a hearing with the goal of establishing important policy findings that guide subsequent APS proceedings before the Commission."

1 And, on a different note, the IBEW Locals would like to
2 point out that an additional, and very important, reason for
3 the Commission to grant their pending Motion to Intervene
4 dated September 4, 2015 is that they, and all other labor
5 organizations who may later appear before this Commission in
6 this or any other case, may be potentially, and uniquely
7 impacted by how the Commission resolves the issues and
8 concerns raised by Intervenors Sunrun, Inc., et al. in their
9 dual disqualification motions dated September 17, 2015.
10 See *Citizens United v. FEC*, 558 U.S. 310, 372-373 (2010)
11 (Roberts, C.J., concurring) (rejecting "a theory of the
12 First Amendment that would allow censorship not only of
13 television and radio broadcasts, but of pamphlets, posters,
14 the Internet, and virtually any other medium that
15 corporations **and unions** might find useful in expressing
16 their views on matters of public concern.") (emphasis
17 added).

18 RESPECTFULLY SUBMITTED this 2nd day of October, 2015.

19 LUBIN & ENOCH, P.C.

20 
21 _____
22 Nicholas J. Enoch, Esq.
23 Attorney for Intervenor-Applicants
24 IBEW Locals 387 & 769

25 Original and thirteen (13) copies
26 of IBEW Locals' Comments filed
27 this 2nd day of October, 2015, with:

28 Arizona Corporation Commission
Docket Control Center
1200 West Washington Street
Phoenix, Arizona 85007-2996

1 Copies of the foregoing transmitted
2 electronically or mailed* this same date to
3 those identified on the attached service list
4 for this docket.

5 /s/ Cristina Gallardo-Sanidad

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