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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITTER SMITH - CHAIRMAN
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE

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2015 NOV 13 P 4: 31

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE COMMISSION'S
INVESTIGATION OF VALUE AND COST OF
DISTRIBUTED GENERATION)

DOCKET NO. E-00000J-14-0023

Arizona Corporation Commission)

DOCKETED)

NOV 13 2015)

TUCSON ELECTRIC POWER'S
AND UNS ELECTRIC'S
COMMENTS ON PROCEDURAL
ISSUES

DOCKETED BY

Tucson Electric Power Company ("TEP") and UNS Electric, Inc. ("UNS Electric") (together "Companies") submit the following comments on procedural issues identified in the October 28, 2015 Procedural Order in this docket.

A. Notice.

Because this proceeding relates to all Commission-jurisdictional electric utilities in Arizona, the Companies submit that notice of this proceeding should be provided through statewide newspaper publication. The cost of publication could be shared by all electric utilities on a pro rata basis. Direct mailing of the notice or bill inserts are not necessary, are costly to ratepayers and may cause undue confusion and delay. Both of the Companies have pending rate cases¹ and, as indicated at the procedural conference, do not intend to submit company-specific cost of service information in this docket. Given that the Companies believe the evidentiary record in this docket will not create any findings that are binding on the Companies' rate cases (or future rate cases), newspaper publication is sufficient.

¹ See Docket Nos. E-04204A-15-0142 (UNS Electric) and E-01933A-15-0322 (TEP).

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B. Hearing Schedule.

The Companies would support two rounds of simultaneous testimony. The hearing in this matter should not conflict with the UNS Electric rate case hearing that is set and noticed to begin on March 1, 2016. UNS Electric believes that the hearing in its rate case may take up to three weeks.

C. Use of Evidentiary Record.

The evidentiary record in this docket should have no binding effect on the pending rate cases for the Companies. Both pending rate cases (and future rate cases) will develop an appropriate evidentiary record based on the actual costs and circumstances for the utility at issue. Moreover, the Companies submit that both the cost of service to distributed generation customers and the value of distributed solar generation are highly dependent on the particular characteristics of a utility and the utility's service area. Finally, in future dockets, the Commission or the Administrative Law Judge could take judicial notice of the evidentiary record and other rulings developed in this docket.

RESPECTFULLY SUBMITTED this 13th day of November 2015.

Tucson Electric Power Company
UNS Electric, Inc.

By 

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1 Original and 13 copies of the foregoing
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