

ORIGINAL

COMMISSIONERS
SUSAN BITTER SMITH – Chairman
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE



0000167331

Chief Administrative Law Judge

RECEIVED

ARIZONA CORPORATION COMMISSION

2015 DEC 17 P 3:55

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

DEC 17 2015

December 17, 2015

Parties to Docket No. E-00000J-14-0023

DOCKETED BY *KG*

The attached email from Duncan Valley Electric Cooperative to Chairman Bitter Smith was docketed by Chairman Bitter Smith's office on December 15, 2015.

Because the email does not indicate that it was provided to all parties to this proceeding, it is being provided to you at this time.

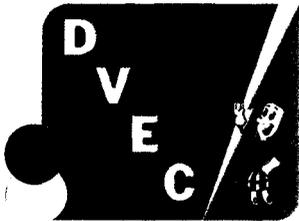
Sincerely,

Teena Jibilian
Assistant Chief Administrative Law Judge

1200 WEST WASHINGTON STREET; PHOENIX, ARIZONA 85007-2927 / 400 WEST CONGRESS STREET; TUCSON, ARIZONA 85701-1347

www.azcc.gov

This document is available in alternative formats by contacting Shaylin Bernal, ADA Coordinator, voice phone number 602-542-3931, E-mail SBernal@azcc.gov.



DUNCAN VALLEY ELECTRIC COOPERATIVE, INC.

PO Box 440
Duncan AZ 85534

379597 AZ 75
Duncan AZ 85534

Owned By Those We Serve - Incorporated - June 1947

Phone: (928) 359-2503

Fax: (928) 359-2370

December 14, 2015

Commissioners
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

2015 DEC 15 P 3:31

AZ CORP COMMISSION
DOCKET CONTROL

HEARING

Re: Docket No. E-00000J-14-0023

Dear Commissioners,

On behalf of board of directors of Duncan Valley Electric Cooperative ("DVEC"), I want to express our disappointment with the recent action by Administrative Law Judge Teena Jibilian and the Procedural Order ("PO") that joins all Arizona jurisdictional electric utilities to this docket.

DVEC is in agreement that there are issues with net metering. We also question what value, if any, distributed generation ("DG") provides for the electric grid as a whole and more specifically DVEC's distribution system. However, at present, DVEC has no case before the commission with associated testimony, cost studies, methodologies, or proposals concerning net metering and DG. The development of such information is a long process and often requires small cooperatives such as ours to hire outside consultants. Requiring DVEC to be part of a docket that has such a quick timeline for submission of such data means that DVEC will have very little, if anything, to contribute to the discussion.

We are also concerned that this lack of necessary time to prepare and submit meaningful data may create a situation where DVEC's rights to due process and a fair and just rate being set in any future proceedings are jeopardized. DVEC does not have immediate plans to ask for rate changes in relation to DG and net metering, and our lack of sufficient time to effectively contribute to the current proceedings should not create a prejudicial impairment on a future filing.

Another aspect that we find troublesome is the requirement to notice our consumer members at DVEC's expense in a matter that we are not asking to be part of. In the future, if or when, DVEC files for consideration of a fair and just rate on DG/net metering, we will again have to notice our consumer members. Since it is not clear in the docket if any binding action will result, we feel that noticing our consumer members at this juncture provides no benefit and only adds to the confusion of what may or may not develop from the proceedings.

We ask that DVEC and its members be excluded from this generic proceeding. DVEC would be happy to participate in a workshop process as is normally done for this type of study. The normal workshop process does provide for timely submission of data and fair and open discussion by all parties involved, not just those that are already prepared because of current or pending rate cases.

Neither this letter nor the docketing and distribution thereof is an intent by DVEC to willingly be joined as a party to this docket, nor, if finally excluded, does DVEC wish to be an intervenor at this point.

Sincerely,



Johnnie Frie, Board President

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DEC 15 2015

ARIZONA CORPORATION COMMISSION
HEARING DIVISION

Copies of the foregoing mailed/delivered
this 17th day of December, 2015 to:

PARTIES TO THIS DOCKET (Service List)

Dillon Holmes
CLEAN POWER ARIZONA
9635 N. 7th Street, #47520
Phoenix, AZ 85068
dillon@cleanpoweraz.org
Consented to Service by Email

C. Webb Crockett
Patrick J. Black
FENNEMORE CRAIG, PC
2394 East Camelback Road, Suite 600
Phoenix, AZ 85016-3429
Attorneys for Freeport Minerals and AECC
wrocket@fclaw.com
pblack@fclaw.com
Consented to Service by Email

Court S. Rich
ROSE LAW GROUP, PC
7144 E. Stetson Dr., Suite 300
Scottsdale, AZ 85251
Attorneys for The Alliance for Solar Choice
CRich@RoseLawGroup.com
Consented to Service by Email

Garry D. Hays
LAW OFFICES OF GARRY D. HAYS PC
1702 East Highland Avenue, Suite 204
Phoenix, AZ 85016
Attorney for Arizona Solar Deployment Alliance

Timothy M. Hogan
ARIZONA CENTER FOR LAW IN THE PUBLIC INTEREST
202 E. McDowell Rd., Suite 153
Phoenix, AZ 85004
Attorneys for the Vote Solar Initiative and Western Resource Advocates

Rick Gillam
Director of Research and Analysis
THE VOTE SOLAR INITIATIVE
1120 Pearl Street, Suite 200
Boulder, CO 80302

Briana Kobor
Program Director – DG Regulatory Policy
THE VOTE SOLAR INITIATIVE
360 22nd Street, Suite 730
Oakland, CA 94612

Ken Wilson
WESTERN RESOURCE ADVOCATES
2260 Baseline Road, Suite 200
Boulder, CO 80302

Craig A. Marks
CRAIG A. MARKS, PLC
10645 N. Tatum Blvd., Suite 200-676
Phoenix, AZ 85028
Attorney for Arizona Utility Ratepayer Alliance
Craig.Marks@azbar.org
Consented to Service by Email

Meghan H. Grabel
OSBORN MALEDON, PA
2929 N. Central Ave., Suite 2100
Phoenix, AZ 85012
Attorney for Arizona Investment Council
mgrabel@omlaw.com
gyaquinto@arizonaic.org
Consented to Service by Email

Daniel W. Pozefsky
RESIDENTIAL UTILITY CONSUMER OFFICE
1110 W. Washington, Suite 220
Phoenix, AZ 85007
dpozefsky@azruco.gov
Consented to Service by Email

Jennifer Cranston
GALLAGHER & KENNEDY, PA
2575 E. Camelback Rd., Suite 1100
Phoenix, AZ 85016
Attorneys for Grand Canyon State Electric Cooperative Association, Inc.
jennifer.cranston@gknet.com
Consented to Service by Email for Grand Canyon State Electric Cooperative Association, Inc.

Also Attorney for Arizona Electric Power Cooperative, Inc. and Dixie Escalante Rural Electric Association, Inc., who have not consented to Email service

Greg Patterson
MUNGER CHADWICK
916 W. Adams, Suite 3
Phoenix, AZ 85007
Attorneys for Arizona Competitive Power Alliance

Michael W. Patten
Timothy J. Sabo
Jason D. Gellman
SNELL & WILMER, LLP
One Arizona Center
400 E. Van Buren St., Suite 1900
Phoenix, AZ 85004
Attorneys for Ajo Improvement Company,
Morenci Water and Electric Company, Trico Electric Cooperative, Inc.,
Tucson Electric Power Company, and UNS Electric, Inc.

Gary Pierson
ARIZONA ELECTRIC POWER COOPERATIVE, INC.
PO BOX 670
1000 S. Highway 80
Benson, AZ 85602

Thomas A. Loquvam
Thomas L. Mumaw
Melissa M. Krueger
PINNACLE WEST CAPITAL CORPORATION
PO BOX 53999, MS 8695
Phoenix, AZ 85072
Attorneys for Arizona Public Service Company

Kerri A. Carnes
ARIZONA PUBLIC SERVICE COMPANY
PO Box 53999, MS 9712
Phoenix, AZ 85072

Charles Kretek, General Counsel
COLUMBUS ELECTRIC COOPERATIVE, INC.
PO Box 631
Deming, NM 88031

LaDel Laub, President and CEO
DIXIE ESCALANTE RURAL ELECTRIC ASSOCIATION, INC.
71 East Highway 56
Beryl UT 84714

Steven Lunt
Chief Executive Officer
DUNCAN VALLEY ELECTRIC COOPERATIVE, INC.
379597 AZ 75
PO Box 440
Duncan, AZ 85534

Dan McClendon
Marcus Lewis
GARKANE ENERGY COOPERATIVE, INC.
PO Box 465
Loa, UT 84747

William P. Sullivan
CURTIS, GOODWIN, SULLIVAN, UDALL & SCHWAB, PLC
501 East Thomas Road
Phoenix, AZ 85012-3205
Attorneys for Garkane Energy Cooperative, Inc., Mohave Electric Cooperative, Inc. and
Navopache Electric Cooperative, Inc.

Than W. Ashby, Office Manager
GRAHAM COUNTY ELECTRIC COOPERATIVE, INC.
9 W. Center St.
PO Drawer B
Pima, AZ 85543

Tyler Carlson, CEO
Peggy Gillman, Manager of Public Affairs
MOHAVE ELECTRIC COOPERATIVE, INC.
PO Box 1045
Bullhead City, AZ 86430

Richard C. Adkerson, CEO
Michael J. Arnold, Director
MORENCI WATER AND ELECTRIC COMPANY
333 N. Central Avenue
Phoenix, AZ 85004

Charles R. Moore
Paul O'Dair
NAVOPACHE ELECTRIC COOPERATIVE, INC.
1878 West White Mountain Blvd.
Lakeside, AZ 85929

Jeffrey W. Crockett
CROCKETT LAW GROUP, PLLC
2198 E. Camelback Road
Phoenix, AZ 85016
Attorney for Sulphur Springs Valley Electric Cooperative, Inc.

Kirby Chapman, CFAO
Jack Blair, CMSO
SULPHUR SPRINGS VALLEY ELECTRIC COOPERATIVE, INC.
311 E. Wilcox
Sierra Vista, AZ 85650

Vincent Nitido, CEO/General Manager
TRICO ELECTRIC COOPERATIVE, INC.
8600 West Tangerine Road
Marana, AZ 85658

Bradley S. Carroll
TUCSON ELECTRIC POWER COMPANY
88 E. Broadway Blvd., MS HQE910
PO Box 711
Tucson, AZ 85701-0711

David G. Hutchens, President
Kevin P. Larson, Director
UNS ELECTRIC, INC.
88 E. Broadway Blvd., MS HQE901
PO Box 711
Tucson, AZ 85701-0711

Janice Alward, Chief Counsel
Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007
tford@azcc.gov
rlloyd@azcc.gov
tbroderick@azcc.gov
mlaudone@azcc.gov
mscott@azcc.gov

Consented to Service by Email

By: Rebecca Unquera
Rebecca Unquera
Assistant to Teena Jibilian