

ORIGINAL



0000167336

BEFORE THE ARIZONA CORPORATION COMMISSION

1

COMMISSIONERS

2

SUSAN BITTER SMITH - CHAIRMAN Arizona Corporation Commission

2015 DEC 17 P 4:41

3

BOB STUMP

DOCKETED

4

BOB BURNS

AZ CORP COMMISSION
DOCKET CONTROL

4

DOUG LITTLE

DEC 17 2015

4

TOM FORESE

5

DOCKETED BY *RF*

6

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

DOCKET NO. E-00000J-14-0023

8

9

10

11

TUCSON ELECTRIC POWER
COMPANY'S AND UNS
ELECTRIC, INC.'S RESPONSE
TO STAFF'S REQUEST FOR
PROCEDURAL ORDER

12

13

14

15

16

17

18

19

20

21

22

23

24

On December 3, 2015, a Procedural Order was issued in the above-captioned docket that (among other things) set a hearing date and ordered Tucson Electric Power Company and UNS Electric, Inc. ("Companies") to provide notice of the proceeding to its customers via bill insert or direct mail by December 30, 2015. The Companies determined that the most economical way to provide such notice was via bill insert. However, because it takes at least 30 days to complete the bill insert process, in order to comply with the procedural order's compliance deadline, the Companies decided to expeditiously commence bill inserts and to then direct mail the notice to those customers who would not receive their monthly bill by December 30th. Under this process, the Companies anticipate that 424,825 customers will receive the notice via bill insert and 82,175 customers will receive the notice via direct mail. The Companies have already printed the notices for the bill inserts and direct mail at a cost of \$12,208 and commenced the bill insert process on December 9, 2015. The total cost of providing this notice is projected to be \$60,856.

25

26

27

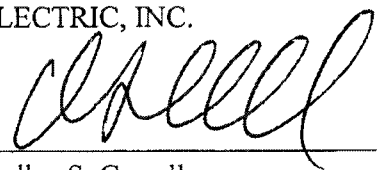
On December 15, 2015, the Utilities Division ("Staff") filed a Request for a Procedural Conference to issues raised by Mohave Electric Cooperative and the Grand Canyon State Electric Cooperative Association (collectively "Cooperatives"). On December 16, 2015, Staff filed a

1 Request for a Procedural Order and requested that the December 30, 2015 deadline for providing
2 customer notice be suspended and that the procedural conference be held after the holidays to
3 discuss the issues raised by the Cooperatives. Counsel for the Companies contacted counsel for
4 Staff to confirm that Staff's request for suspension of the compliance deadline was not intended to
5 suggest that the Companies discontinue providing notice to its customers, as such process is well
6 underway.

7 The Companies support Staff's request for a suspension of the compliance deadline which
8 will provide the Companies an opportunity to provide all customers the notice by bill insert (which
9 would be completed by approximately January 10, 2016), thereby saving the Companies
10 approximately \$49,000 in direct mailing costs. Customers receiving the notice in January will still
11 have at least than two weeks prior notice of the January 29, 2016 intervention deadline. However,
12 the Companies believe that regardless of the issues raised by the Cooperatives and the temporary
13 suspension of the compliance deadline until a procedural conference is held, the form of notice
14 (and the dates set forth therein) should not be changed for the Companies. The Companies have
15 already printed approximately 358,000 copies of the notice for all customers and approximately 25
16 percent of their customers have already received notice via bill insert. Any change to the notice at
17 this point would result in additional considerable expense and lead to customer confusion.

18 RESPECTFULLY SUBMITTED this 17th day of December 2015.

19
20 TUCSON ELECTRIC POWER COMPANY
21 UNS ELECTRIC, INC.

22 By 

23
24 Bradley S. Carroll
25 Tucson Electric Power Company
26 88 East Broadway Blvd., MS HQE910
27 P. O. Box 711
Tucson, Arizona 85702

and

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Michael W. Patten
Timothy J. Sabo
Jason D. Gellman
One Arizona Center
Snell & Wilmer L.L.C.
400 East Van Buren Street
Phoenix, Arizona 85004

Attorneys for Tucson Electric Power Company
and UNS Electric, Inc.

Original and 13 copies of the foregoing
filed this 17th day of December 2015 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Copies of the foregoing hand-delivered/mailed
this 17th day of December 2015 to the following:

Teena Jibilian
Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Janice M. Alward, Esq.
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Thomas Broderick
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

C. Webb Crockett
Patrick Black
Fennemore Craig PC
2394 E. Camelback Road, Suite 600
Phoenix, Arizona 85016

Dillon Holmes
Clean Power Arizona
9635 N. 7th Street, #47520
Phoenix, AZ 85068

1 Court S. Rich
Rose Law Group, PC
2 7144 E. Stetson Drive, Suite 300
Scottsdale, AZ 85251
3
4 Daniel W. Pozefsky
Chief Counsel
Residential Utility Consumer Office
5 1110 West Washington, Suite 220
Phoenix, AZ 85007
6
7 Jeffrey Crockett
Crockett Law Group PLLC
1702 E. Highland Ave., Suite 204
8 Phoenix, Arizona 85016
9 Kirby Chapman, CPA
Chief Financial and Administrative Officer
10 Sulphur Springs Valley Electric Cooperative, Inc.
311 E. Wilcox
11 Sierra Vista, Arizona 85650
12 Meghan H. Grabel
Osborn Maledon, PA
13 2929 North Central Avenue
Phoenix, Arizona 85012
14
15 Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd., Suite 200-676
16 Phoenix, Arizona 85028
17 Thomas A. Loquvam
Melissa M. Krueger
18 Thomas L. Mumaw
Pinnacle West Capital Corporation
19 P.O. Box 53999, MS 8695
Phoenix, Arizona 85072-3999
20
21 Kerri A. Carnes
Arizona Public Service Company
P.O. Box 53999, MS 9712
22 Phoenix, Arizona 85072-3999
23 Jennifer A. Cranston
Gallagher & Kennedy, PA
24 2575 E. Camelback Road, 11th Floor
Phoenix, Arizona 85016
25
26 Garry D. Hays
Law Offices of Garry D. Hays, PC
1702 E. Highland Ave., Suite 204
27 Phoenix, Arizona 85016

- 1 Timothy M. Hogan
Arizona Center for Law in the Public Interest
514 W. Roosevelt Street
- 2 Phoenix, Arizona 85003

- 3 Rick Gilliam
Director of Research and Analysis
- 4 The Vote Solar Initiative
1120 Pearl Street, Suite 200
- 5 Boulder, Colorado 80302

- 6
- 7 Briana Kobor, Program Director
Vote Solar
360 22nd Street, Suite 730
- 8 Oakland, CA 94612


- 9 Ken Wilson
Western Resource Advocates
- 10 2260 Baseline Road, Suite 200
Boulder, Colorado 80302
- 11
- 12 Greg Patterson
Arizona Competitive Power Alliance
916 West Adams, Suite 3
- 13 Phoenix, Arizona 85007

- 14 Gary Pierson
Arizona Electric Power Cooperative, Inc.
- 15 P.O. Box 670
1000 S. Highway 80
- 16 Benson, Arizona 85602

- 17 Charles C. Krettek
Columbus Electric Cooperative, Inc.
- 18 P.O. Box 631
Deming, New Mexico 88031
- 19
- 20 LaDel Laub
Dixie Escalante Rural Electric Association
71 E. Highway 56
- 21 Beryl, Utah 84714

- 22 Steven Lunt
Duncan Valley Electric Cooperative, Inc.
- 23 379597 AZ 75
P.O. Box 440
- 24 Duncan, Arizona 85534

- 25 Dan McClendon
Garkane Energy Cooperative
- 26 P.O. Box 465
Loa, Utah 84747
- 27

- 1 William P. Sullivan
Curtis, Goodwin, Sullivan, Udall & Schwab, PLC
501 E. Thomas Road
- 2 Phoenix, Arizona 85012
- 3 Than W. Ashby
Graham County Electric Cooperative, Inc.
- 4 9 W. Center Street
P.O. Drawer B
- 5 Pima, Arizona 85543
- 6 Tyler Carlson
Peggy Gillman
- 7 Mohave Electric Cooperative, Inc.
P.O. Box 1045
- 8 Bullhead City, Arizona 86430
- 9 Richard C. Adkerson
Michael J. Arnold
- 10 Morenci Water and Electric Company
333 N. Central Ave.
- 11 Phoenix, Arizona 85004
- 12 Charles R. Moore
Paul O'Dair
- 13 Navopache Electric Cooperative, Inc.
1878 W. White Mountain Blvd.
- 14 Lakeside, Arizona 85929
- 15 Albert Gervenack
Sun City West Property Owners & Residents Association
13815 Camino Del Sol
- 16 Sun City West, Arizona 85375
- 17
- 18
- 19
- 20 By 
- 21
- 22
- 23
- 24
- 25
- 26
- 27