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USA
Cooperatives

Touchstone Energy® Cooperatives

December 17, 2015

Chairman Susan Bitter Smith
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

Re: IN THE MATTER OF THE COMMISSION'S INVESTIGATION OF VALUE
AND COST OF DISTRIBUTED GENERATION
Docket No. E-00000J-14-0023

Dear Chairman Bitter Smith:

On December 3, 2015, a procedural order was issued in the above-referenced matter mandatorily joining Arizona Electric Power Cooperative, Inc. ("AEPSCO") and several of its members to the docket.

As you are aware, this docket is a generic investigation into the value and cost of distributed generation, which is an issue relevant to utilities with retail customers and net metering programs. As a generation cooperative, which supplies wholesale power to its five Arizona Class A Member distribution cooperatives, AEPSCO has neither retail customers nor a net metering program. Accordingly, AEPSCO does not believe it is a necessary or relevant party to the docket.

Moreover, AEPSCO is concerned about the impact that some of the procedural requirements will have on its members. Historically, the Commission has acknowledged and accommodated the unique operational needs of the rural cooperative community, including the limited financial and personnel resources available to cooperatives. AEPSCO urges the Commission to continue to be sensitive to the challenges facing cooperative entities and adopt flexible policies and procedures that allow cooperatives to comply with Commission directives in the manner that will be least injurious to their operations.

Arizona Corporation Commission

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Very truly yours,

Patrick F. Ledger
Chief Executive Officer

cc : Commissioners
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