

ORIGINAL



0000167424

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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

RECEIVED
AZ CORP COMMISSION
DOCKET CONTROL
2015 DEC 23 PM 3 42

Arizona Corporation Commission
DOCKETER
DEC 23 AM
DOCKETER

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

DOCKET NO. E-00000J-14-0023

PROCEDURAL ORDER
(Extends Deadline for Mailing Notice)

BY THE COMMISSION:

On December 3, 2013, the Arizona Corporation Commission ("Commission") issued Decision No. 74202 in Docket No. E-01345A-13-0248. As part of that Decision, the Commission ordered that a generic docket be opened on net metering ("NM") issues, and that workshops be held with all stakeholders to help inform future Commission policy on the value that distributed generation ("DG") installations bring to the grid.¹ As a result, this docket was opened.

On October 20, 2015, at its regularly scheduled Open Meeting, in the course of considering Docket No. E-01345A-13-0248,² the Commission ordered that an evidentiary hearing be held in this generic docket to include, in addition to the value and cost of DG, cost of service issues related to Arizona Public Service Company's ("APS's") provision of service to DG and non-DG customers.

On October 23, 2015, ASDA filed its Application for Leave to Intervene.

On October 28, 2015, a Procedural Order was issued setting a procedural conference for the purpose of allowing interested parties to discuss procedural matters related to the evidentiary hearing. The Procedural Order was mailed to then-existing parties to this docket,³ and also to all parties to Docket No. E-01345A-13-0248.

¹ Decision No. 74202 at 30.

² In the matter of the application of Arizona Public Service Company for approval of net metering cost shift solution. The Commission closed Docket No. E-01345A-13-0248 by Decision No. 75290 (October 27, 2015).

³ Parties granted intervention in this docket prior to the October 20, 2015 Open Meeting at which the evidentiary hearing was ordered include The Alliance for Solar Choice ("TASC"), Clean Power Arizona, Freeport Minerals Corporation ("Freeport Minerals"), and Arizonans for Electric Choice and Competition ("AECC").

1 On November 2, 2015, APS filed its Motion to Intervene, Vote Solar filed its Petition for Leave
2 to Intervene, and Arizona Utility Ratepayer Alliance (“AURA”) filed its Motion to Intervene.

3 On November 2, 2015, Arizona Investment Council (“AIC”) filed its Motion for Leave to
4 Intervene, and Sulphur Springs Valley Electric Cooperative, Inc. (“SSVEC”) filed its Application to
5 Intervene.

6 On November 4, 2015, the procedural conference convened as scheduled. Appearances were
7 entered through counsel for APS, SSVEC, TASC, Freeport Minerals, AECC, AURA, RUCO, Western
8 Resource Advocates (“WRA”), Vote Solar, AIC, TEP, UNSE, and the Commission’s Utilities Division
9 (“Staff”).

10 Attendees at the November 4, 2015, procedural conference discussed several procedural issues,
11 including appropriate means of providing public notice of this docket and the evidentiary hearing,
12 appropriate timeframes for the provision of documentation in preparation for the evidentiary
13 proceeding, and appropriate means for making the evidentiary record produced through this generic
14 hearing process available to specific ratemaking proceedings. A deadline for filing written comments
15 on procedural issues related to the evidentiary hearing was set for November 13, 2015.

16 On November 4, 2015, the Residential Utility Consumer Office (“RUCO”) filed its Application
17 to Intervene.

18 On November 6, 2015, Tucson Electric Power Company (“TEP”) and UNS Electric, Inc.
19 (“UNSE”) jointly filed an Application for Leave to Intervene.

20 On November 13, 2015, Grand Canyon State Electric Cooperative Association, Inc.
21 (“GCSECA”)⁴ filed its Motion to Intervene.

22 On November 13, 2015, written comments were filed by APS, TEP, UNSE, GCSECA, AIC,
23 TASC, Vote Solar, AURA, RUCO, and Staff.

24 On November 16, 2015, the Arizona Competitive Power Alliance (“ACPA”) filed its
25 Application for Leave to Intervene.

26 On November 19, 2015, WRA filed its Petition for Leave to Intervene.

27 ⁴ GCSECA’s members include Duncan Valley Electric Cooperative, Inc. (“DVEC”), Graham County Electric Cooperative,
28 Inc. (“GCEC”), Navopache Electric Cooperative, Inc. (“NEC”), Mohave Electric Cooperative, Inc. (“MEC”), SSVEC, and
Trico Electric Cooperative, Inc. (“Trico”).

1 On November 24, 2015, Staff filed supplemental written comments.

2 On December 3, 2015, following consideration of the oral and written comments received in
3 this docket regarding procedural issues related to the evidentiary hearing to be held in this docket, a
4 Procedural Order was issued governing procedural matters. The Procedural Order set the hearing to
5 commence on April 18, 2016, and set associated public notice requirements and testimony filing
6 deadlines. In consideration of the purpose and subject of the evidentiary hearing in this docket, the
7 Procedural Order joined all Arizona jurisdictional electric utilities as parties to this proceeding.

8 The Procedural Order granted intervention to ASDA, Vote Solar, AURA, AIC, RUCO,
9 GCSECA, ACPA, WRA, and the Energy Freedom Coalition of America ("EFCA"), and approved
10 Consents to Email Service completed by RUCO, AURA, Staff, AIC, TASC, Freeport Minerals, AECC,
11 and Clean Power Arizona.

12 On December 4, 2015, a Procedural Order was issued rescinding the erroneous grant of
13 intervention to the Energy Freedom Coalition of America ("EFCA"). EFCA did not request
14 intervention in this docket.

15 **Filings Following December 3, 2015 Procedural Order**

16 On December 9, 2015, Chairman Bitter Smith's office filed a copy of an email letter received
17 from MEC, and on that same date, the Hearing Division provided a copy of the email to all parties.
18 The letter requested that Chairman Bitter Smith instruct the ALJ to exclude MEC from this proceeding.
19 The letter stated that MEC has no issues before the Commission concerning NM and DG; cannot
20 describe to its members why it is a party; and has no data or analysis to present. The letter also
21 expressed objection, on the grounds of the costs of mailing and addressing potential customer
22 confusion, to being required to provide notice to its customers as required by the December 13, 2015
23 Procedural Order.

24 On December 14, 2015, GCSECA filed its Objection and Request for Clarification Re
25 December 3, 2015 Procedural Order. In its filing, GCSECA reiterated its position set forth in its
26 November 13, 2015 written comments. GCSECA stated its objection to the joinder of all Arizona
27 jurisdictional utilities as parties to this docket, and to the requirement that the utilities mail notice of
28 the hearing to all their customers. GCSECA specifically pointed out that AEPCO has no retail

1 customers, and argued that AEPCO therefore has no direct interest in the topics of DG or NM, and
2 should be removed as a party and relieved of obligations imposed by the December 3, 2015 Procedural
3 Order. Additionally, GCSECA requested clarification regarding whether and to what extent the record
4 and findings in this docket will be binding on future ratemaking proceedings.

5 On December 15, 2015, Chairman Bitter Smith's office filed a copy of an email received from
6 DVEC.

7 On December 15, 2015, Staff filed its Request for a Procedural Conference. Staff's filing
8 requested that a procedural conference be convened to discuss the issues raised in MEC's and
9 GCSECA's filings.

10 On December 16, 2015, Staff filed its Request for a Procedural Order. Staff's filing stated that
11 it recognizes that it may be difficult, with parties' schedules, to convene a procedural conference before
12 the end of the year. Staff also stated that it had conferred with counsel for MEC and GCSECA, and
13 believed that with further discussion, the parties may be able to resolve the issues raised in filings by
14 those parties in a manner satisfactory to everyone. Staff stated that it continues to support the
15 requirement that customers of all electric companies regulated by the Commission receive notice of
16 this proceeding. In recognition of concerns regarding the costs associated with customer notice, Staff
17 recommended that the public notice deadline be suspended until parties have an opportunity to suggest
18 customer notice deadlines that are feasible and which they believe can be met. Staff stated that it would
19 support the cooperatives having the opportunity to draft and submit their own form of notice for
20 consideration.

21 With respect to any requirement for participation in this proceeding, Staff stated that it views
22 the parties' level of participation, beyond responding to data requests, to be subject to their discretion.
23 Staff stated that it believes the setting of deadlines for the pre-filing of proposals and exhibits by the
24 December 13, 2015 Procedural Order does not require any entity to make a filing unless it so chooses.

25 Staff requested that the December 30, 2015 deadline for mailing notice in this case be
26 suspended, and that a procedural conference be held after the holidays only if necessary to discuss the
27 issues raised by MEC and GCSECA.

28 On December 17, 2015, GCSECA filed its Response to Staff's December 16, 2015 Request for

1 Procedural Order. GCSECA joined in Staff's request for the suspension of the December 30, 2015
2 deadline for parties to mail public notice. GCSECA stated that it believes a procedural conference will
3 be necessary to discuss issues related to the scope of the proceeding and the future applicability of
4 findings made in this docket. GCSECA renewed its objection regarding joinder of all jurisdictional
5 electric utilities to this proceeding.

6 Regarding notice issues, GCSECA proposed that its member cooperatives be afforded
7 flexibility to select the appropriate delivery method for notice based on their individual operational and
8 financial situations, such as sending bill inserts, publishing in their newsletters, or publishing in
9 newspapers of general circulation in their service territories. GCSECA proposed that the deadline for
10 completing notice be set for January 30, 2016. GCSECA proposed an alternative form of notice for its
11 members to provide.

12 On December 17, 2015, TEP and UNSE filed their Response to Staff's Request for Procedural
13 Order. TEP and UNSE stated that in order to comply with the December 3, 2015 Procedural Order
14 notice requirements, they had commenced mailing bill inserts for some customers as soon as possible,
15 and had arranged for direct mail to the remaining customers for which bill inserts would not be possible
16 under the current deadline time constraints. TEP and UNSE expressed support for Staff's request for
17 a suspension of the notice compliance deadline, because an extension of the deadline would provide
18 TEP and UNSE an opportunity to provide all customers the notice by bill insert, by January 10, 2016,
19 at a significant cost reduction compared to their planned partial direct mailing.

20 On December 17, 2015, the Hearing Division provided a copy to all parties of the December
21 15, 2015, email from DVEC filed in the docket by Chairman Bitter Smith's office.

22 On December 17, 2015, NEC filed a copy of its letter to Chairman Bitter Smith. The letter
23 stated that NEC's Board instructed that the letter be sent to Chairman Bitter Smith requesting that NEC:
24 1) not be joined as a party to this proceeding; 2) not be required to send the ordered form of notice; and
25 3) not be required to send notice to all its members. The letter stated that NEC supports the
26 Commission's decision to examine the cost and value of DG, and will gladly share its general thoughts
27 either directly or through GCSECA during voluntary workshops. The letter stated that NEC requested
28 rate adjustments in 2011 and 2014, and is currently considering another filing in 2016. The letter stated

1 that NEC has neither the time nor the financial ability to actively participate in this proceeding, and
2 asked that NEC be excluded.

3 On December 18, 2015, AEPCO filed a copy of its letter to Chairman Bitter Smith. AEPCO
4 stated that as a generation cooperative, it has neither retail customers nor a net metering program, and
5 does not believe it is a necessary or relevant party to this docket.

6 On December 21, 2015, one consumer comment was filed expressing opposition to an alternate
7 fee schedule for net metering customers.

8 On December 22, 2015, Commissioner Little filed a letter outlining his views regarding the
9 purpose of the evidentiary hearing, expected outcomes of the process, and parties' participation.
10 Commissioner Little's letter also enumerated some specific issues/questions he believes should be
11 addressed by participating parties.

12 On December 22, 2015, Morenci Water and Electric Company ("MWE") and Ajo Improvement
13 Company ("AIC") filed their Proof of Mailing and Comments Regarding December 3, 2015 Procedural
14 Order. MWE and AIC stated that they have no objection to GCSECA's request to extend the deadline
15 to provide notice, or to the submission of an alternative form of notice to GCSECA member customers.
16 MWE and AIC stated that they both oppose any requirement that they make a second mailing to their
17 own customers, and would oppose requiring them to provide any alternative form of notice due to the
18 additional costs they would incur. MWE and AIC expressed agreement with Staff that no entity should
19 be required to submit any cost of service or value of solar study, or make any filing in this proceeding.
20 MWE and AIC stated that neither utility has the resources to submit any such studies by the deadlines
21 set by the December 3, 2015 Procedural Order; that neither utility intends to take an active role in the
22 proceeding; that neither utility currently has a general rate case before the Commission; and that neither
23 utility intends to file a general rate case in 2016.

24 On December 23, 2015, a Notice of Change of Address was filed by counsel for Vote Solar and
25 WRA.

26 **Extension of Deadline for Providing Customer Notice**

27 Staff and GCSECA's requests for the extension of the deadline for the provision of notice is
28 reasonable and should be granted. GCSECA proposed a new deadline of January 30, 2016. The

1 deadline should be extended to February 1, 2015.

2 As an electric generation cooperative, AEPCO's customers are its members. AEPCO's
3 members have received notice of this proceeding via the December 3, 2015 Procedural Order, and
4 AEPCO should not be required to provide the notice to them again.

5 **Alternative Manner for Providing Notice**

6 GCSECA proposed that its member cooperatives be afforded flexibility to select the appropriate
7 delivery method for notice based on their individual operational and financial situations, such as
8 sending bill inserts, publishing in their newsletters, or publishing in newspapers of general circulation
9 in their service territories. This proposal is reasonable and will be approved.

10 **Form of Notice**

11 GCSECA proposed an alternative form of notice as an option for its members to provide. The
12 proposed alternative included additional language that GCSECA stated was drafted with the intent of
13 clarifying the context of the evidentiary hearing and avoiding customer confusion given the generic
14 nature of this docket.

15 As GCSECA pointed out in its December 17, 2015 filing, many utilities, including some
16 cooperatives, have already made arrangements for the provision of notice in the form prescribed by the
17 December 3, 2015 Procedural Order. It is important that the substantive content of the notice provided
18 to customers be uniform statewide. While the alternative form of notice proposed by GCSECA as an
19 additional notice option is not approved, we find that under the circumstances of this proceeding,
20 utilities should be authorized to add their own introductory paragraphs to the form of notice prescribed
21 by the December 3, 2015 Procedural Order, to appear above the "Public Notice" caption to provide
22 additional helpful information to their customers.

23 **Effect of the Record in this Proceeding on Future Ratemaking Proceedings**

24 GCSECA requested clarification regarding whether and to what extent the record and findings
25 in this docket will be binding on future ratemaking proceedings. If necessary, a procedural conference
26 will be scheduled for discussion of those issues.

27 **Approval of Consents to Email Service**

28 The December 3, 2015 Procedural Order provided that parties could opt to receive service of

1 all filings in this docket, including all filings by parties and all Procedural Orders and Recommended
2 Opinions and Orders/Recommended Orders issued by the Commission's Hearing Division, via its
3 designated email address rather than via U.S. Mail.

4 APS, Vote Solar, and WRA have opted to receive service of all filings in this docket via their
5 designated email addresses rather than via U.S. Mail. They exercised this option, pursuant to the
6 Procedural Order issued on December 3, 2015, by docketing a hard copy of their Consent to Email
7 Service by sending an email, containing the consenting party's name and the docket number for this
8 matter to HearingDivisionServicebyEmail@azcc.gov from their designated email addresses. The
9 Hearing Division has verified the validity of the designated email addresses which now appear on the
10 service list for this matter in addition to addresses for U.S. Mail.

11 APS's, Vote Solar's, and WRA's Consents to Email Service should be approved.

12 IT IS THEREFORE ORDERED that the **December 30, 2015 deadline** set forth in the
13 December 3, 2015 Procedural Order for Arizona jurisdictional electric utilities to **provide notice of**
14 **this proceeding is hereby extended to February 1, 2016.**

15 IT IS FURTHER ORDERED that the **deadline for intervention in this matter is hereby**
16 **extended to February 19, 2015.**

17
18 IT IS FURTHER ORDERED that **the requirement set forth in the December 3, 2015**
19 **Procedural Order for Arizona jurisdictional electric utilities to provide a copy of the prescribed**
20 **form of notice by First Class U.S. Mail is hereby amended, to allow utilities to provide the**
21 **required notice by either a bill insert, direct mail, inclusion in an electric utility cooperative**
22 **newsletter, or by publication at least once in a newspaper (or newspapers) of general circulation**
23 **in the utility's service territory.**

24 IT IS FURTHER ORDERED that **Arizona jurisdictional electric utilities may include, in a**
25 **paragraph that precedes the "Public Notice" caption appearing in the form of notice prescribed**
26 **by the December 3, 2015 Procedural Order, their own individual introduction to the prescribed**
27 **form of notice.**

1 IT IS FURTHER ORDERED that **Arizona jurisdictional electric utilities who have not yet**
2 **begun providing public notice as ordered by the December 3, 2015 Procedural Order shall amend**
3 **the prescribed form of notice set forth in the December 3, 2015 Procedural Order to reflect the**
4 **new February 19, 2015 deadline for intervention.**

5 IT IS FURTHER ORDERED that Ajo Improvement Company, Arizona Electric Power
6 Cooperative, Inc., Arizona Public Service Company, Columbus Electric Cooperative, Inc., Dixie-
7 Escalante Rural Electric Association, Inc., Duncan Valley Electric Cooperative, Inc., Garkane Energy
8 Cooperative, Inc., Graham County Electric Cooperative, Inc., Mohave Electric Cooperative, Inc.,
9 Morenci Water and Electric Company, Navopache Electric Cooperative, Inc., Sulphur Springs Valley
10 Electric Cooperative, Inc., Trico Electric Cooperative, Inc., Tucson Electric Power Company, and UNS
11 Electric, Inc. **shall each file a certification that the provision of notice as ordered herein has been**
12 **accomplished**, as soon as possible after the provision of notice has been completed, but no later than
13 **February 11, 2016.**

14 IT IS FURTHER ORDERED that the members of Arizona Electric Power Cooperative, Inc.
15 have received notice of this proceeding via the December 3, 2015 Procedural Order, and therefore
16 AEPCO is not required to provide the notice again, or to file proof of notice.

17 IT IS FURTHER ORDERED that **all procedural requirements and deadlines not modified**
18 **above remain unchanged.**

19 IT IS FURTHER ORDERED that the requests by **APS, Vote Solar, and WRA** to receive
20 service of all filings in this docket, including **all filings by parties and all Procedural Orders and**
21 **Recommended Opinions and Orders/Recommended Orders issued by the Commission's Hearing**
22 **Division**, via their designated email addresses rather than via U.S. Mail, is hereby approved.

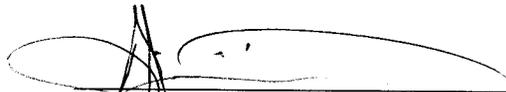
23 IT IS FURTHER ORDERED that **a party's election to receive service of all filings in this**
24 **matter via email does not change the requirement that all filings with the Commission's Docket**
25 **Control must be made in hard copy and must include an original and 13 hard copies.**

26 IT IS FURTHER ORDERED that the Ex Parte Rule (A.A.C. R14-3-113 - Unauthorized
27 Communications) applies to this proceeding and shall remain in effect until the Commission's Decision
28

1 in this matter is final and non-appealable.

2 IT IS FURTHER ORDERED that the Administrative Law Judge may rescind, alter, amend, or
3 waive any portion of this Procedural Order either by subsequent Procedural Order or by ruling at
4 hearing.

5 DATED this 23^d day of December, 2015.

6
7 

8 TEENA JIBILIAN
9 ASSISTANT CHIEF ADMINISTRATIVE LAW JUDGE

9 Copies of the foregoing mailed/delivered
10 this 23rd day of December, 2015 to:

11 Dillon Holmes
12 CLEAN POWER ARIZONA
13 9635 N. 7th Street, #47520
14 Phoenix, AZ 85068
15 dillon@cleanpoweraz.org

16 **Consented to Service by Email**

17 C. Webb Crockett
18 Patrick J. Black
19 FENNEMORE CRAIG, PC
20 2394 East Camelback Road, Suite 600
21 Phoenix, AZ 85016-3429
22 Attorneys for Freeport Minerals and AECC
23 wrocket@fclaw.com
24 pblack@fclaw.com

25 **Consented to Service by Email**

26 Court S. Rich
27 ROSE LAW GROUP, PC
28 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

...

1 Timothy M. Hogan
ARIZONA CENTER FOR LAW IN THE PUBLIC INTEREST
2 514 W. Roosevelt St.
Phoenix, AZ 85003
3 Attorneys for the Vote Solar Initiative and Western Resource Advocates
thogan@aclpi.org
4 rick@votesolar.org
5 briana@votesolar.org
ken.wilson@westernresources.org

6 **Consented to Service by Email**

7 Craig A. Marks
CRAIG A. MARKS, PLC
8 10645 N. Tatum Blvd., Suite 200-676
Phoenix, AZ 85028
9 Attorney for Arizona Utility Ratepayer Alliance
10 Craig.Marks@azbar.org

11 **Consented to Service by Email**

12 Meghan H. Grabel
OSBORN MALEDON, PA
13 2929 N. Central Ave., Suite 2100
Phoenix, AZ 85012
14 Attorney for Arizona Investment Council
mgrabel@omlaw.com
15 gyaquinto@arizonaaic.org

16 **Consented to Service by Email**

17 Daniel W. Pozefsky
RESIDENTIAL UTILITY CONSUMER OFFICE
18 1110 W. Washington, Suite 220
Phoenix, AZ 85007
19 dpozefsky@azruco.gov

20 **Consented to Service by Email**

21 Jennifer Cranston
GALLAGHER & KENNEDY, PA
22 2575 E. Camelback Rd., Suite 1100
Phoenix, AZ 85016
23 Attorneys for Grand Canyon State Electric Cooperative Association, Inc.
jennifer.cranston@gknet.com

24 **Consented to Service by Email for Grand Canyon State Electric Cooperative Association, Inc.**

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

26 ...

27 ...

1 Greg Patterson
MUNGER CHADWICK
2 916 W. Adams, Suite 3
Phoenix, AZ 85007
3 Attorneys for Arizona Competitive Power Alliance

4 Michael W. Patten
5 Timothy J. Sabo
Jason D. Gellman
6 SNELL & WILMER, LLP
One Arizona Center
7 400 E. Van Buren St., Suite 1900
Phoenix, AZ 85004
8 Attorneys for Ajo Improvement Company,
9 Morenci Water and Electric Company, Trico Electric Cooperative, Inc.,
Tucson Electric Power Company, and UNS Electric, Inc.

10 Richard C. Adkerson
11 Chief Executive Officer
AJO IMPROVEMENT COMPANY
12 333 N. Central Ave.
13 Phoenix, AZ 85004-2189

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

17 Thomas A. Loquvam
18 Thomas L. Mumaw
Melissa M. Krueger
19 PINNACLE WEST CAPITAL CORPORATION
PO BOX 53999, MS 8695
20 Phoenix, AZ 85072
21 Attorneys for Arizona Public Service Company
Thomas.loquvam@pinnaclewest.com

22 **Consented to Service by Email**

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

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

1 LaDel Laub, President and CEO
2 DIXIE ESCALANTE RURAL ELECTRIC ASSOCIATION, INC.
3 71 East Highway 56
4 Beryl UT 84714

4 Steven Lunt
5 Chief Executive Officer
6 DUNCAN VALLEY ELECTRIC COOPERATIVE, INC.
7 379597 AZ 75
8 PO Box 440
9 Duncan, AZ 85534

8 Dan McClendon
9 Marcus Lewis
10 GARKANE ENERGY COOPERATIVE, INC.
11 PO Box 465
12 Loa, UT 84747

11 William P. Sullivan
12 CURTIS, GOODWIN, SULLIVAN, UDALL & SCHWAB, PLC
13 501 East Thomas Road
14 Phoenix, AZ 85012-3205
15 Attorneys for Garkane Energy Cooperative, Inc., Mohave Electric Cooperative, Inc. and
16 Navopache Electric Cooperative, Inc.

15 Than W. Ashby, Office Manager
16 GRAHAM COUNTY ELECTRIC COOPERATIVE, INC.
17 9 W. Center St.
18 PO Drawer B
19 Pima, AZ 85543

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

22 Richard C. Adkerson, CEO
23 Michael J. Arnold, Director
24 MORENCI WATER AND ELECTRIC COMPANY
25 333 N. Central Avenue
26 Phoenix, AZ 85004

25 Charles R. Moore
26 Paul O'Dair
27 NAVOPACHE ELECTRIC COOPERATIVE, INC.
28 1878 West White Mountain Blvd.
Lakeside, AZ 85929

1 Jeffrey W. Crockett
2 CROCKETT LAW GROUP, PLLC
3 2198 E. Camelback Rd., Suite 305
4 Phoenix, AZ 85016
5 Attorney for Sulphur Springs Valley Electric Cooperative, Inc.

6 Kirby Chapman, CFAO
7 Jack Blair, CMSO
8 SULPHUR SPRINGS VALLEY ELECTRIC COOPERATIVE, INC.
9 311 E. Wilcox
10 Sierra Vista, AZ 85650

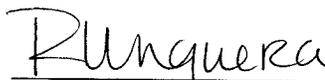
11 Vincent Nitido, CEO/General Manager
12 TRICO ELECTRIC COOPERATIVE, INC.
13 8600 West Tangerine Road
14 Marana, AZ 85658

15 Bradley S. Carroll
16 TUCSON ELECTRIC POWER COMPANY
17 88 E. Broadway Blvd., MS HQE910
18 PO Box 711
19 Tucson, AZ 85701-0711

20 David G. Hutchens, President
21 Kevin P. Larson, Director
22 UNS ELECTRIC, INC.
23 88 E. Broadway Blvd., MS HQE901
24 PO Box 711
25 Tucson, AZ 85701-0711

26 Janice Alward, Chief Counsel
27 Legal Division
28 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

25 By: 
26 Rebecca Unquera
27 Assistant to Teena Jibilian
28