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Arizona Corporation Commission

DOCKETED

JAN 27 2016

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BEFORE THE ARIZONA CORPORATION COMMISSION

14 DOUG LITTLE – Interim Chairman
15 BOB STUMP
16 BOB BURNS
17 TOM FORESE
18 VACANT

19 IN THE MATTER OF THE APPLICATION
20 OF UNS ELECTRIC, INC. FOR THE
21 ESTABLISHMENT OF JUST AND
22 REASONABLE RATES AND CHARGES
23 DESIGNED TO REALIZE A REASONABLE
24 RATE OF RETURN ON THE FAIR VALUE
25 OF THE PROPERTIES OF UNS ELECTRIC,
26 INC. DEVOTED TO ITS OPERATIONS
THROUGHOUT THE STATE OF ARIZONA
AND FOR RELATED APPROVALS.

Docket No. E-04204A-15-0142

**VOTE SOLAR'S RESPONSE
TO ARIZONA UTILITY
RATEPAYER ALLIANCE'S
MOTION TO EXTEND
PROCEDURAL SCHEDULE**

On January 26, 2016, the Arizona Utility Ratepayer Alliance ("AURA") filed a motion to extend the procedural schedule for the rate design portion of the UNS Electric rate case. Vote Solar supports AURA's motion to extend the procedural schedule.

1 As AURA explains in its motion, UNS Electric fundamentally changed its rate
2 design proposals when it filed rebuttal testimony on January 19, 2016.¹ The Company
3 announced in rebuttal that it now supports a mandatory demand charge for all residential
4 customers, which would be a significant departure from the two-part rates that Arizona
5 residential ratepayers have long been accustomed to. Moreover, as AURA notes, UNS
6 filed 171 pages of new rate design testimony in rebuttal, which was over 30 pages more
7 than the Company's direct testimony on rate design.² UNS's rate design rebuttal
8 testimony also included lengthy supporting testimony from a new witness, economist H.
9 Edwin Overcast.

10 Vote Solar and the other parties will need additional time to adequately respond
11 to UNS's new rate design proposals and the new testimony and analysis presented in the
12 Company's rebuttal testimony. Under the current procedural schedule, Intervenors and
13 Staff surrebuttal testimony is due February 19, 2016. This current deadline falls just one
14 month after UNS proposed fundamental rate design changes, and additional time is
15 necessary to allow Intervenors and Staff to take full discovery on UNS's new proposals
16 and new testimony, and to draft surrebuttal testimony. Similarly, additional time will be
17 needed to adequately prepare for the hearing on these critical rate design measures,
18 which is currently scheduled to begin March 1, 2016.

19 Extending the procedural schedule may also allow the pending generic "Value of
20 Solar" proceeding to provide important data and insights into UNS's rate design
21 proposals for solar distributed generation. The hearing in the Value of Solar proceeding
22 is scheduled to begin on April 18, 2016, and direct testimony is due February 25, 2016.³
23 The parties here have explained that the Value of Solar proceeding may provide useful
24

25 ¹ AURA Mot. to Extend Procedural Schedule 2:3-8 (Jan. 26, 2016).

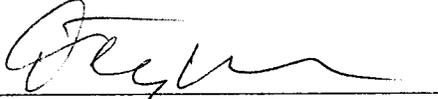
26 ² *Id.* at 2:5-8.

³ Docket No. E-00000J-14-0023, Dec. 3, 2015 Procedural Order 3:25-28, 4:4-7.

1 information to assess UNS's rate design proposals for solar customers,⁴ and extending
2 the procedural schedule may allow that to occur.

3 For these reasons, Vote Solar supports AURA's motion to extend the procedural
4 schedule.

5
6 DATED this 27th day of January, 2016.

7 By 
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19 ORIGINAL and 13 COPIES of the
20 Foregoing filed this 27th day of January,
21 2016, with:

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27th day of January, 2016, to:

All Parties of Record


⁴ See, e.g., Thomas M. Broderick Direct Test. 11:7-9; Briana Kobor Direct Test. 28 n.87.