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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

COMMISSIONERS

DOUG LITTLE - INTERIM CHAIRMAN
BOB STUMP
BOB BURNS
TOM FORESE
VACANT

DOCKETED 2016 JAN 27 P 4: 24

JAN 27 2016

AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY [Signature]

IN THE MATTER OF THE APPLICATION OF) DOCKET NO. E-04204A-15-0142
UNS ELECTRIC, INC. FOR THE)
ESTABLISHMENT OF JUST AND)
REASONABLE RATES AND CHARGES) UNS ELECTRIC'S OPPOSITION
DESIGNED TO REALIZE A REASONABLE) TO AURA'S MOTION TO
RATE OF RETURN ON THE FAIR VALUE OF) EXTEND PROCEDURAL
THE PROPERTIES OF UNS ELECTRIC, INC.) SCHEDULE
DEVOTED TO ITS OPERATIONS)
THROUGHOUT THE STATE OF ARIZONA)
AND FOR RELATED APPROVALS.)

UNS Electric, Inc. responds in opposition to the "Motion to Extend Procedural Schedule" filed on January 26, 2016 by Quinn and Associates, LLC d/b/a the Arizona Utility Ratepayer Alliance ("AURA").

I. Introduction.

AURA's Motion is based on the assertion that UNS Electric's rebuttal to Staff's rate design proposal "has completely changed [UNS Electric's] rate-design proposal." However, contrary to AURA's assertion, UNS Electric's rebuttal testimony simply indicated that Staff's rate design proposal would be acceptable to UNS Electric with certain limited modifications. Staff's rate design proposal was filed on December 9, 2015 - almost seven weeks before AURA filed its motion. Even if UNS Electric had opposed Staff's proposal, AURA certainly knows that the Commission could adopt Staff's proposal and that AURA would have to address Staff's position in AURA's surrebuttal under the existing procedural schedule.

Based on UNS Electric's response to and conditional support of Staff's rate design proposal, AURA now argues that the hearing should be bifurcated into revenue requirement and rate design portions, and that the dates for rate design surrebuttal and the rate design portion of the

1 hearing be delayed at least two months. AURA contends that this extraordinary extension of time,
2 at this late stage of the case, is necessary because UNS Electric “has abandoned its initial filing and
3 submitted essentially a new rate-design case” [Motion at 2:14] by agreeing to Staff’s proposal to
4 move all customers to three part rates.

5 AURA’s motion should be denied. This is not a new issue introduced in UNS Electric’s
6 rebuttal case. The issue of three-part rates was extensively discussed in UNS Electric’s application
7 and direct testimony, and in the direct testimony of Staff and numerous other parties. In addition,
8 it is commonplace for Staff to make recommendations different from the utility’s original proposal,
9 and for the utility to accept some of those recommendations. It is also common for the
10 Commission to adopt some or all of Staff’s recommendations in a rate case. Granting an extension
11 of time here would have the perverse result of discouraging utilities from seriously considering and
12 agreeing with Staff proposals for fear of delaying their cases.

13 **II. Argument.**

14 **A. As an Intervenor, AURA accepts the procedural status of this docket as is.**

15 In intervening in this docket, AURA accepts the procedural posture of the docket, including
16 the procedural schedule adopted by the Commission. AURA also should understand that Staff and
17 intervening parties may propose revenue requirements and rate designs that are different than the
18 Company. At the time AURA intervened, it knew that Staff and other parties would be filing rate
19 design testimony on December 9, 2015 and that it would have until February 19, 2016 (almost two
20 and a half months) to conduct discovery and respond to that testimony. It also knew the timing of
21 the rebuttal testimony.

22 It now appears that AURA has sat on its hands in investigating Staff’s proposal. The
23 Company understands that AURA had not submitted any discovery to Staff regarding its proposal.¹
24 Even if UNS Electric had opposed Staff’s rate design proposal outright in its rebuttal, the Staff
25 proposal was on the table and a possible outcome of this rate case. AURA would still have to

26 _____
27 ¹ AURA also conducted no discovery into UNS Electric’s rate design proposal other than asking for UNS
Electric’s responses to data requests from other parties. AURA has had access to such information through
the rate case data room since it was granted intervention.

1 address Staff's proposal under the procedural schedule in place when it intervened. AURA's claim
2 that it cannot evaluate, conduct discovery and prepare surrebuttal regarding what is effectively
3 Staff's proposal is the result of AURA's own inactivity. AURA cannot now seek to disrupt the
4 process and schedule that has been in place for months.

5 **B. Three-part rates have been part of this case from the beginning.**

6 AURA argues that UNS Electric "did an abrupt about-face and abandoned its originally
7 proposed two-part rate design for Staff's proposed three-part rate design." [AURA Motion at 2:3-
8 4]. UNS Electric has not "abandoned" its proposal. Although the Company supports Staff's
9 proposal, UNS Electric would accept its original rate design if adopted by the Commission. Nor
10 are three-part rates some new, unanticipated issue that AURA must now address without sufficient
11 time to prepare. To the contrary, three-part rates have been discussed throughout the case.

12 Three-part rates were extensively discussed in the Direct Testimony submitted with UNS
13 Electric's Application. UNS Electric President David Hutchens devoted a large portion of his
14 Direct Testimony to rate design issues (pages 10-16), explaining how the company's rate design
15 proposals are designed to align rates with customer usage of the system as well as enabling UNS
16 Electric to recover its fixed costs. The first rate design proposal addressed in Mr. Hutchens'
17 testimony was UNS Electric's proposal for three-part rates. Mr. Hutchens explained that "the three
18 part rate design would be mandatory for all new DG and other partial requirements customers and
19 would be available as an option for non-DG customers." [Hutchens Direct Testimony at 10:15-
20 18]. Hutchens explained that "a three-part rate design sends more appropriate price signals, allows
21 customers to reduce their bills by managing their energy consumption through EE or DG, and
22 helps mitigate the DG cost shift by better aligning rates with the way the customers use the
23 Company's electric system." [Hutchens Direct Testimony at 10:17-21].

24 In addition, UNS Electric witness Dallas Dukes devoted an entire section of his Direct
25 Testimony to "Three Part Rate Proposals." [Dukes Direct Testimony at pages 24 to 27]. Mr.
26 Dukes explained UNS Electric's proposed three-part rates in detail, and he also explained how the
27 three-part rates will benefit customers. For example, he explained that "[u]nder a three-part rate,

1 customers receive a price signal encouraging them to improve their load factor, which benefits the
2 customers by reducing their electric bills and benefits all UNS Electric customers as the system is
3 used more efficiently.” [Dukes Direct Testimony at 26:7-10] UNS Electric also submitted
4 proposed tariff sheets for its three part rates, as set forth in its proposed Residential Service
5 Demand (RES-01 Demand) and Residential Service Demand Time-of-Use (RES-01 TOU) rates.
6 [Direct Testimony of Craig A. Jones at Exhibits CAJ-3 (clean tariffs) and CAJ-4 (redline tariffs) at
7 tariff sheets 106, 106-1, 106-2, 107, 107-1, 107-2].

8 All of this information was available for review in this docket for five months before
9 AURA filed its motion to intervene on October 2, 2015 and nearly nine months before AURA filed
10 this motion.²

11 **C. The rate design testimony of other parties shows that everyone understood that**
12 **three-part rates would be addressed in this case.**

13 Staff and numerous intervenors addressed three-part rates for residential and other
14 customer classes in their direct rate design testimony, demonstrating that all parties were well
15 aware of this issue. Indeed, even AURA’s witness, Thomas Alston, discussed his concerns with
16 three-part rates in his testimony. [Alston Direct Testimony at 5-7]. Moreover, The Alliance for
17 Solar Choice submitted testimony by Mark Fulmer, which included sections discussing three-part
18 rates in general, UNS Electric’s proposed three-part rates in particular, and a description of why he
19 believes time of use rates are superior to three-part rates. [Fulmer Direct Testimony at 7-15 and
20 18-25]. Likewise, Vote Solar witness Briana Kobor discussed three-part rates at length. [Kobor
21 Direct Testimony at 23; 33-42]. Western Resource Advocates witness Kenneth L. Wilson and
22 SWEEP witness Jeff Schlegel also addressed three-part rates in their testimonies. [Wilson Direct
23 Testimony at 5-11; Schlegel Direct Testimony at 10-11]. Freeport/AECC/Nobel witness Kevin
24 Higgins, FPAA witnesses Lance Jungmeyer and Kent Simer, and Nucor witness Dr. Jay Zarnikau
25 also discusses various issues regarding demand charges (the medium and large general service
26 customers they represent are already on three-part rates with demand charges). And, of course,

27 _____
² UNS Electric had opposed AURA’s intervention in this docket given the nature of the entity.

1 both RUCO and Staff addressed three-part rates at length in their testimony. [Huber Direct
2 Testimony at 15-24; Broderick Direct Testimony at 2-10; Solganick Direct Testimony at 7-15].
3 Thus, all parties understood that three-part rates for residential customers were at issue in this case.

4 **D. AURA has unduly delayed bringing its motion.**

5 UNS Electric already has three-part rates for its medium and large general service
6 customers. In its Direct Testimony, UNS Electric proposed to extend three-part rates to residential
7 and small general service customers, by making three-part rates mandatory for DG customers and
8 optional for other residential and small general service customers. AURA now claims that it needs
9 more time to address the proposed mandatory extension of three-part rates to all customers.
10 However, AURA has already addressed their concerns with the proposed mandatory three-part
11 rates for DG customers as well as demand charges for residential customers in general, as have
12 Vote Solar witness Kobor and TASC witness Fulmer.

13 AURA's protestations further ring hollow because AURA, as acknowledged in response to
14 a data request, is funded by solar interests, who were already impacted by UNS Electric's original
15 proposal to require mandatory three-part rates for DG customers (i.e. those customers with solar
16 systems). Any delay to considering modifications to rate design benefits solar interests, but not the
17 vast majority of customers who are paying for the DG cost shift. To the extent that AURA is
18 actually concerned with the application of three-part rates to non-DG residential customers (i.e.
19 non-solar customers), UNS Electric's Direct Testimony proposed optional three-part rates for non-
20 DG residential customers. Thus, the issue of residential three-part rates was already raised.
21 Moreover, it was Staff—not UNS Electric—that proposed extending three-part rates to all
22 residential customers. To the extent AURA is concerned with the mandatory, as opposed to
23 optional, nature of the recommendation, AURA was on notice of the recommendation when Staff
24 filed its rate design testimony on December 9, 2015—that is 48 days before AURA filed its motion
25 on January 26, 2016. If AURA was truly concerned with this issue, it should have moved for more
26 time once it reviewed Staff's testimony.

27

1 Finally, while AURA's motion makes much of the length of UNS Electric's rebuttal
2 testimony, UNS Electric was simply agreeing to the proposal advanced by Staff, with minor
3 modifications, while also rebutting the rate design issues raised by numerous intervenors, including
4 issues regarding residential demand charges. AURA's motion simply does not explain why it
5 waited nearly 50 days to raise its concern.

6 **E. An extension of time is not warranted under the time clock rule.**

7 The Commission's time clock rule governs the schedule in rate cases. Yet AURA's motion
8 does not even mention the time clock rule. Under the time clock rule, an extension of the schedule
9 may be granted only in the following circumstances:

10
11 Upon motion of any party to the matter or on its own motion, the Commission or
12 the Hearing Officer may determine that the time periods prescribed by sub-
13 section (B)(11)(d) should be extended or begin again due to:

- 13 i. Any amendment to a filing which changes the amount sought by the utility
14 or substantially alters the facts used as a basis for the requested change in rates or
15 charges; or
- 16 ii. An extraordinary event, not otherwise provided for by this subsection.

17 A.A.C. R14-2-103(B)(11)(e). UNS Electric's rebuttal testimony did not change the amount the
18 Company seeks, although UNS Electric did state that it would accept the lower revenue
19 requirement proposed by Staff subject to minor corrections. Presumably, AURA does not object to
20 the utility being willing to accept a lower amount. And AURA's motion admits that this case is
21 primarily about rate design, not revenue requirement. Nor have the facts been substantially
22 altered. UNS Electric's rebuttal testimony does not change the underlying facts supporting either
23 optional or mandatory three-part rates, e.g. the need to send efficient price signals about demand.
24 All UNS Electric has done is indicate conditional support of Staff's proposal. Thus, none of the
25 factors listed in R14-2-103(B)(11)(e)(i) are present.

26 The other circumstance is R14-2-103(B)(11)(e)(ii), which permits an extension is an
27 "extraordinary event". A utility agreeing with Staff is not an "extraordinary event". Nor does
AURA's motion claim that there has been an extraordinary event. Again, AURA has already

1 addressed the issue of three-part rates in its rate design testimony. [Alston Direct Testimony at 5-
2 7]. To the extent AURA opposes Staff's December 9, 2015 proposal to extend three-part rates to
3 additional customers, that proposal was made nearly three months before the hearing, giving
4 AURA plenty of time. Moreover, AURA has extensive resources and experience to bring to bear
5 on the issue. AURA has the services of an experienced rate case attorney, a rate design witness in
6 Mr. Alston, as well as Mr. Quinn, who has decades of experience in rate design issues as a former
7 utility executive and former director of RUCO.

8 Moreover, each party that filed revenue requirement testimony agrees that UNS Electric is
9 under-earning and requires rate relief. The time clock rule was adopted to ensure that utilities
10 receive timely decisions when they need rate relief. [See Decision No. 57875 (May 18, 1992) at
11 Attachment B, pages 20-22)]. Such is the case here.

12 **F. There are no notice issues.**

13 AURA's motion claims that "many other organizations are just becoming aware of the
14 scope and importance of UNSE's rate-design overall, for which they received no notice at all. This
15 case could affect rates for low-income customers, senior citizens, communities, and other
16 traditional intervenors in Tucson Electric and APS rate cases." [AURA Motion at page 2:20-23].
17 There has been no deficiency in notice. The form of notice prescribed by the Hearing Division
18 expressly noted that the Company was seeking rate design changes and included Commission-
19 mandated language:

20 The Commission's Utilities Division Staff and the Residential Utility Consumer
21 Office are in the process of reviewing and analyzing the application and have not
22 yet made recommendations regarding UNSE's request. The Commission will
23 determine the appropriate rate relief to be granted based on the evidence of record
24 in this proceeding. THE COMMISSION IS NOT BOUND BY THE PROPOSALS MADE BY UNSE, STAFF, OR ANY INTERVENORS AND, THEREFORE, THE FINAL RATES APPROVED IN THIS DOCKET MAY BE LOWER OR HIGHER THAN THE RATES DESCRIBED ABOVE.

25
26 UNS Electric's Notice of Publication and Mailing, filed Sept. 9, 2015 (extension in original). The
27 notice was mailed to each customer of UNS Electric, was made available in various libraries in

1 UNS Electric's service territory, and was also published in *The Kingman Daily Miner*, the *Nogales*
2 *International*, the *Sana Cruz Valley Power Pak*, and *Today's News-Herald* in Lake Havasu City.

3 It is commonplace for Staff to disagree with, modify, revise or extend proposals made by a
4 utility. Likewise, it is commonplace for a utility to accept at least some recommendations made by
5 Staff. It is also common for the Commission to resolve issues in a different manner than proposed
6 by the parties. This is why the Commission requires the language above in notices. Moreover,
7 AURA's principal, Pat Quinn, and its attorney, Craig Marks, have decades of experience in rate
8 cases and are well aware that Staff can make new proposals and that utilities often accept Staff
9 proposals.

10 As for AURA's expressed concern for "traditional" intervenors in TEP or APS cases, there
11 are 18 intervenors in this case, including RUCO, TASC, Vote Solar, Ms. Zwick for the
12 Community Action Association, SWEEP, Noble, AECC/Freeport, Wal-Mart, AIC, Nucor and
13 Western Resource Advocates. Those intervenors cover a broad range of interests.

14 **G. Practical issues also counsel against delay.**

15 There are a large number of parties to this case who have all made time in their schedules
16 for the scheduled hearing. In addition to this proceeding, the Commission has the following
17 hearings scheduled: (i) the Value of Solar proceeding scheduled for April 18th through May 6th
18 (approximately the same date that AURA now seeks for this proceeding), (ii) the Tucson Electric
19 Power REST Plan hearing starting on April 4th, (iii) the Sulphur Springs Electric Cooperative rate
20 case starting on May 17th, (iv) the Trico Electric Cooperative rate case starting July 17th and (v) the
21 Tucson Electric Power rate case starting August 31st. These hearings will occupy the attention of
22 many of the same parties, lawyers, and witnesses this docket. And these hearings do not include
23 the other significant non-electric proceedings that have been scheduled.

24 **III. Response to RUCO.**

25 RUCO filed a response agreeing with AURA's motion. RUCO's response raises no new
26 arguments beyond what AURA argues. To the extent that RUCO seeks public comment sessions,
27

1 RUCO should have raised the concept months ago and certainly shortly after Staff filed its rate
2 design proposal.

3 **IV. Conclusion.**

4 The Commission should not tolerate the unfounded delay sought by AURA. AURA has
5 ignored Staff's proposal in the docket and now attempts to remedy its own inaction by delaying a
6 process that has been in place for months. The motion must be denied.

7 RESPECTFULLY SUBMITTED this 27th day of January, 2016.

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