

Columbus Electric Cooperati



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P.O. BOX 631 · 900 NORTH GOLD · DEMING, NEW MEXICO 88031 · (575)546-8838

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December 23, 2015

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AZ CORP COMMISSION
DOCKET CONTROL

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

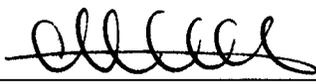
Re: Docket No. E-00000J-14-0023

Dear Sir or Madam:

Please find enclosed a duplicate original and thirteen (13) copies of the letter sent by Columbus Electric to the Chairman of the Arizona Corporation Commission and which is being submitted for filing in the above-referenced docket, along with a certificate of service, but is not intended to be a general entry of appearance or a waiver of any claims or defenses Columbus may have in this matter.

Sincerely,

COLUMBUS ELECTRIC COOPERATIVE, INC.

By 
Charles C. Kretek,
General Counsel

Arizona Corporation Commission
DOCKETED

DEC 28 2015

DOCKETED BY 

Columbus Electric Cooperative, Inc.

P.O. BOX 631 · 900 NORTH GOLD · DEMING, NEW MEXICO 88031 · (575)546-8838

December 23, 2015

Susan Bitter-Smith, Chair
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Re: Docket E-000000J-14-0023

Dear Ms. Bitter-Smith:

Columbus Electric Cooperative, Inc. ("CEC") would like to join the chorus of similarly situated cooperatives expressing concern regarding inclusion in the above referenced docket. After review of the positions recently expressed in this matter by Mohave Electric Cooperative ("Mohave") and Navopache Electric Cooperative, ("Navopache"), the Board of Trustees of CEC, at its regular monthly meeting on Tuesday, December 22, 2015, expressed its desire to voice its concerns regarding participation in the above referenced docket and directed me to draft and send this letter to you, with a copy included in the docket.

CEC is a New Mexico Rural Electric Cooperative headquartered in Deming, Luna County, New Mexico and authorized to do business in Arizona. Included in CEC's approximately 7,000 square mile service territory, is a portion of Cochise County, Arizona. CEC's system is comprised of approximately 130 miles of overhead transmission lines, 2,100 miles of overhead distribution lines, of which 123 miles of overhead distribution lines is situated in Arizona. Of the approximately 5,100 meters in place, 483 (or 9%) are located in Arizona. Of the approximately 101,000,000 kWh sold annually, 5,877,773 kWh (or 5.8%) are sold to Arizona consumers. Of CEC's \$13,638,354 in annual revenue, roughly \$768,492 (or 5.6%) is derived from Arizona Consumers. Finally, of the \$41,274,441 total plant in service, \$3,110,071 (or 7.5%) is located in Arizona. Based largely on these facts, in Decision No. 74297, CEC was found to be engaged in interstate commerce and granted an exemption from the application of A.R.S. Sections 40-301, 40-302, 40-303 and 40-285, as they related to certain borrowing and financial transactions.

Furthermore, in CEC's last rate case, E-01851A-13-0252, the ACC granted CEC's request to implement rates, rules and regulations for its Arizona consumers identical to CEC's New Mexico consumers, including the right to apply a single calculation of the Fuel and Purchased Power Cost Adjustment mechanism (see Decision 74390).

As is the case with Mohave and Navopache, CEC is not a party to the APS or TEP rate issues nor does it have any interest in the same and the costs associated with being drafted into docket number E-000000J-14-0023, are more similar to those cited by Mohave and Navopache, as opposed to those cited by TEP and UNS. Furthermore, as was shown in CEC's last rate case,

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the Arizona consumers of CEC are actually served at a loss, and therefore the burden of these costs would be far more detrimentally impactful and would ultimately be unfairly borne by CEC's New Mexico consumers.

CEC respectfully asks that it be excused from participating in the aforementioned docket as a party, but if so required by the Commission, will remain as an interested party to allow for CEC to supply comments as requested by ACC staff, provided that CEC is exempted from the more onerous and burdensome requirements of participation, such as publication and notification.

Thank you for your attention to and consideration of this matter.

Sincerely,



By _____
Chris Martinez, Executive Vice-President and
General Manager

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS**

3 GARY PIERCE, Chairman
4 BRENDA BURNS
5 BOB STUMP
6 SUSAN BITTER SMITH
7 BOB BURNS

8
9 IN THE MATTER OF THE COMMISSION'S)
10 INVESTIGATION OF VALUE AND COST)
11 OF DISTRIBUTED GENERATIONS)
12)

DOCKET NO. E-0000J-14-0023

CERTIFICATE OF SERVICE

13
14 I hereby certify that I have, on behalf of Columbus Electric Cooperative, Inc. ("CEC"),
15 mailed copies CEC's Letter to Susan Bitter-Smith, Chairperson, to:

16
17 Dillon Holmes
18 CLEAN POWER ARIZONA
19 9635 N. 7th Street #47520
20 Phoenix, AZ 85068;

21
22 C. Webb Crockett
23 Patrick J. Black
24 FENNMORE CRAIG, PC
25 2394 East Camelback Road, Suite 600
26 Phoenix, AZ 85016-2439;

27
28 Court S. Rich
29 ROSE LAW GROUP, PC
30 7144 E. Stetson Dr., Suite 300
31 Scottsdale, AZ 85251;

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33 Garry D. Hayes
34 LAW OFFICES OF GARRY D. HAYS, PC
35 1702 East Highland Ave, Suite 204
36 Phoenix, AZ 85016;

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38 Timothy M. Hogan
39 ARIZONA CENTER FOR LAW IN THE PUBLIC INTEREST
40 202 E. McDowel RD, Suite 153
41 Phoenix, AZ 85004;

42
43 Rick Gillam
44 Director of Research and Analysis
45 THE VOTE SOLAR INITIATIVE

1 1120 Pearl Street, Suite 200
2 Boulder, CO 80302;

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4 Briana Kobor
5 Program Director – DG Regulatory Policy
6 THE VOTE SOLAR INITIATIVE
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8 Oakland, CA 94612;

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10 Ken Wilson
11 WESTERN RESOURCE ADVOCATES
12 2260 Baseline Road, Suite 200
13 Boulder, CO 80302;

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17 10645 N. Tatum Blvd., Suite 200-676
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20 Meghan H. Grabel
21 OSBORN MALEDON, PA
22 2929 N. Central Ave., Suite 2100
23 Phoenix, AZ 85012;

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26 RESIDENTIAL UTILITY CONSUMER OFFICE
27 1110 W. Washington, Suite 220
28 Phoenix, AZ 85007;

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30 Jennifer Cranston
31 GALLAGHER & KENNEDY, PA
32 2575 E. Camelback Rd., Suite 1100
33 Phoenix, AZ 85016;

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35 Greg Patterson
36 MUNGER CHADWICK
37 916 W. Adams, Suite 3
38 Phoenix, AZ 85007;

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40 Michael W. Patten
41 Timothy J. Sabo
42 Jason D. Gellman
43 SNELL & WILMER, LLP
44 One Arizona Center
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1 Gary Pierson
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3 PO Box 670
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5 Benson, AZ 85602;

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7 Thomas A Loquvam
8 Thomas L. Mumaw
9 Melissa M. Krueger
10 PINNACLE WEST CAPITAL CORPORATION
11 PO Box 53999, MS 8595
12 Phoenix, AZ 85072;

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14 Kerri A. Carnes
15 ARIZONA PUBLIC SERVICE COMPANY
16 PO Box 53999, MS 9712
17 Phoenix, AZ 85072;

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19 LaDel Laub
20 President and CEO
21 DIXIE ESCALANTE RURAL ELECTRIC ASSOCIATION, INC.
22 71 East Highway 56
23 Beryl, UT 84714;

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25 Steven Lunt
26 Chief Executive Officer
27 DUNCAN VALLEY ELECTRIC COOPERATIVE, INC.
28 379597 AZ 75
29 PO Box 440
30 Duncan, AZ 85534;

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32 Dan McClendon
33 Marcus Lewis
34 GARKANE ENERGY COOPERTAIVE, INC.
35 PO Box 465
36 Loa, UT 84747;

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38 William P. Sullivan
39 CURTIS, GOODWIN, SULLIVAN, UDALL & SCHWAB, PLC
40 501 East Thomas Road
41 Phoenix, AZ 85012-3205;

42
43 Than W. Ashby
44 GRAHAM COUNTY ELECTRIC COOPERATIVE, INC.
45 9W. Center ST.
46 PO Drawer B

1 Pima, AZ 85543;

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3 Tyler Carson
4 CEO
5 MOHAVE ELECTRIC COOPERATIVE, INC.
6 PO Box 1045
7 Bullhead City, AZ 86430;

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9 Richard C. Adkerson
10 Michael J. Arnold
11 MORENCI WATER AND ELECTRIC COMPANY
12 333 N. Central Avenue
13 Phoenix, AZ 85004;

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15 Charles R. Moore
16 Paul O'Dair
17 NAVOPACHE ELECTRIC COOPERATIVE, INC.
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19 Lakeside, AZ 85929;

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21 Jeffrey W. Crockett
22 CROCKETT LAW GROUP, PLLC
23 1702 E. Highland Ave., Suite 204
24 Phoenix, AZ 85016;

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26 Kirby Chapman
27 Jack Blair
28 SULPHUR SPRINGS VALLEY ELECTRIC COOPERATIVE, INC.
29 311 E. Wilcox
30 Sierra Vista, AZ 85650;

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32 Vincent Nitido
33 CEO/General Manager
34 TRICO ELECTRIC COOPERATIVE, INC.
35 8600 West Tangerine Blvd.
36 Marana, AZ 85658;

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38 Bradley S. Carroll
39 TUCSON ELECTRIC POWER COMPANY
40 88 E. Broadway Blvd., MS HQE910
41 PO Box 711
42 Tucson, AZ 85701-0711;

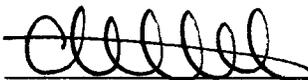
43
44 David G. Hutchens
45 Kevin P. Larson
46 UNS ELECTRIC INC.

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88 E. Broadway Blvd., MS HQE901
PO Box 711
Tucson, AZ 85701-0711;

Janice Alward
Chief Counsel, Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007

Dated at Deming, New Mexico, this 23rd day of December, 2015.



Charles C. Kretek,
General Counsel
COLUMBUS ELECTRIC COOPERATIVE, INC.