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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

- SUSAN BITTER SMITH - Chairman
- BOB STUMP¹
- BOB BURNS
- DOUG LITTLE
- TOM FORESE

AZ...
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IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY
FOR APPROVAL OF ITS 2016 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
PLAN.

DOCKET NO. E-01933A-15-0239

**STAFF'S SUPPLEMENTAL RESPONSE TO
EFCA'S MOTION FOR PROCEDURAL
CONFERENCE**

On November 19, 2015, the Energy Freedom Coalition of America ("EFCA") filed a motion for a procedural conference wherein it asserted a number of alleged factual issues that warranted having an evidentiary hearing regarding Tucson Electric Power's ("TEP") Utility Owned Distributed Generation Program ("UODG") which is part of TEP's Renewable Energy Surcharge and Tariff Plan ("REST Plan"). The Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") and TEP filed responses on November 24, 2015. On December 1, 2015, EFCA filed a reply in support of its motion wherein it also suggested a hearing was necessary for TEP's proposed Residential Community Solar Program ("CSP"), but did not raise any specific factual issues.

The Administrative Law Judge held a procedural conference on December 17, 2015, to discuss "the issues raised by EFCA and Staff's response ..." At that time, Staff indicated that it was supportive of having an evidentiary hearing for the UODG Program. During the procedural conference, EFCA, for the first time, also raised specific issues relating to TEP's CSP. Following the procedural conference, EFCA filed a response, pursuant to Staff's request, wherein it specifically enumerated a partial list of "issues of fact that are unresolved" regarding the CSP.

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Arizona Corporation Commission
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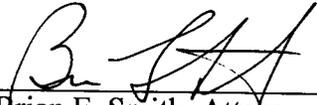
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¹ TEP also filed a Supplemental Response in Opposition to EFCA's Motion for Procedural Conference on November 25, 2015.

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1 After reviewing EFCA's response, Staff agrees that there are some issues of fact to be
2 evaluated relating to the CSP in TEP's REST Plan that are worthy of further evaluation/investigation
3 through an evidentiary hearing process. Therefore, Staff is supportive of evaluating the UODG and
4 the CSP together in an evidentiary hearing.

5 RESPECTFULLY SUBMITTED this 30th day of December 2015.

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7 
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15 30th day of December 2015 with:

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