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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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DOUG LITTLE, Chairman
BOB STUMP, Commissioner
BOB BURNS, Commissioner
TOM FORESE, Commissioner
ANDY TOBIN, Commissioner

AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY *KG*

IN THE MATTER OF THE APPLICATION OF GARKANE ENERGY COOPERATIVE, INC., AN ELECTRIC COOPERATIVE NONPROFIT MEMBERSHIP CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS PROPERTY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RETURN THEREON, AND TO APPROVE RATES DESIGNED TO DEVELOP SUCH RETURN AND REQUEST FOR WAIVER.

DOCKET NO. E-01891A-15-0176

MOTION TO LEAVE DOCKET OPEN FOR UP TO 12 MONTHS RELATED TO TIME OF USE RATES

Garkane Energy Cooperative, Inc. ("GEC"), by and through undersigned counsel, moves to leave this docket open for up to twelve (12) months to provide GEC time to better evaluate whether to submit one or more time of use ("TOU") rates for application within its Arizona service territory. Although GEC's Application in this matter indicated it was seeking "implementation of a residential time of use rate in those locations where GEC has the technical ability to implement such rates" (Application at pp. 5-6), no actual proposal was included in the application or in the pre-filed testimony. GEC is just starting to install meters in Arizona that could be used with TOU rates. It desires additional experience with the residential TOU rate implemented in Utah before deciding whether it is appropriate for Arizona. GEC believes that it will take between six and ten months to gather relevant information and to determine whether a TOU rate or rates should be made available in Arizona at this time and, if so, the appropriate design of that rate or rates.

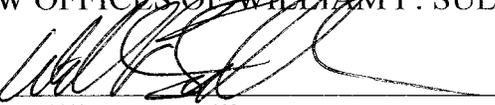
In the pre-filed direct testimony of Eric Hill, Staff indicated support for a residential TOU rate, provided it was first submitted for Commission consideration and approval. E Hill

1 Direct (1/20/16), p. 3, lines 16-20. GEC has discussed the timing of such filing with Staff and
2 GEC's uncertainties relating to whether and what type of TOU rate(s) should be proposed for
3 Arizona. Staff has indicated it is supportive of leaving the docket in this matter open for up to
4 12 months to afford GEC the opportunity to pursue one or more TOU rates in Arizona, in its
5 discretion. GEC notes that this request is similar to the request previously granted to leave this
6 docket upon for 12 months to allow GEC to submit a revised form of Net Metering Tariff, at
7 its discretion.

8 Wherefore, GEC requests this docket remain open for 12 months to allow GEC, at its
9 option, to submit for the Commission's consideration and possible approval, one or more TOU
10 rates for use in Arizona.

11 **RESPECTFULLY SUBMITTED this 29th day of March, 2016.**

12
13 LAW OFFICES OF WILLIAM P. SULLIVAN, P.L.L.C

14 By: 

15 William P. Sullivan, Esq.
16 501 East Thomas Road
17 Phoenix, Arizona 85012-3205
18 Attorneys for Garkane Energy Cooperative, Inc.

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PROOF OF AND CERTIFICATE OF MAILING

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I hereby certify that on this 29th day of March, 2016, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

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

With a copy thereof
emailed, hand-delivered and/or mailed to:

Robin Mitchell, Esq.
Matthew Laudone, Esq.
Legal Division
1200 W. Washington Ave.
Phoenix, Arizona 85007
(Hand-delivery and email)

Sarah N. Harpring, Administrative Law Judge
Hearing Division
1200 W. Washington Ave.
Phoenix, Arizona 85007
(Hand-delivery and email)

Court S. Rich, Esq.
Rose Law Group, PC
7144 East Stetson Drive, Suite 300
Scottsdale, Arizona 85251
Attorneys for The Alliance for Solar Choice
(mail and email)

