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Investigator: Tom Davis Phone: <<< REDACTED >>> Opinion Date: 4/8/2016  
Opinion Number: 2016 - 130010 Priority: Respond within 5 business days  
Opinion Codes: Rate Case Items - In Favor Closed Date: 4/8/2016 4:25 PM

First Name: Charles Last Name: Mosley Account Name: Charles Mosley  
Address: <<< REDACTED >>>  
City: Sedona State: AZ Zip Code: 86336  
Work: <<< REDACTED >>> Email: <<< REDACTED >>>

Company: Arizona Public Service Company

Nature Of Opinion

Docket Number: E-01345A-16-0056

Docket Position: For

Charles Mosley, P.E. - City of Sedona Director of Wastewater I am writing in support of the Docket , regarding the Preference Power Rider, with certain modifications as described below. The modifications are requested to assure that the stated intent of the rate rider is met. The preamble of the rate rider states , "This program supports Arizona's effort to take full advantage of the State's allocation of hydro-electric power from Hoover Dam ..." In order to accomplish this purpose I am requesting that element 5 of the Preference Power Rider be revised to allow use of Layoff Power even if that results in an annual or seasonal allotment being exceeded. The City of Sedona is an approved recipient of Hoover Power per Arizona Power Authority Schedule D. In short the City of Sedona receives its Hoover Allocation through the Arizona Power Authority, which in turn received it from the Western Area Power Administration. On page 19 of its Final Marketing Plan Post-2017, the Arizona Power Authority referred to ARS 30-124(B). That section says that APA is to dispose of power "as nearly as practical, shall be disposed of in an equitable manner so as to render the greatest public service and at levels calculated to encourage the widest practical use of electrical energy" . The layoff power element of the APA power management program promotes this goal by allowing an entity which is allocated power to layoff unused power for other program participants to use. Such a provision allows for the "greatest public service" by allowing an entity which may be experiencing a temporary or seasonal reduction in power need to allow other participating entities to use a portion of its allocation. Such a use of the layed off power could result in entity using the layed off power exceeding its annual or seasonal allotment as defined in the proposed APS Preference Power Rate Rider. Not allowing the power to be layed off could harm the public interest by discouraging conservation and/or leading to higher per unit costs for energy actually used since entities must pay APA of their monthly allocation of costs that can't be layed off. To address this issue I am requesting that element 5 of the Preference Power Rider be revised to "allow the annual total of Preference Power to be limited to the customer's annual and seasonal Allotment plus up to twenty percent of the allotment value in Layoff Power". Item 6 will also need to be amended to allow credit for up to this quantity. I believe do this will better address the requirements of ARS 30-124 (B) regarding the public interest in the use of this power.

Investigation  
Date: 4/8/2016 Analyst: Tom Davis Submitted By: Telephone Type: Investigation

Entered for the record and docketed. CLOSED

Arizona Corporation Commission

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