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10 **BEFORE THE ARIZONA CORPORATION COMMISSION**

11 DOUG LITTLE, Chairman
12 BOB STUMP
13 BOB BURNS
14 TOM FORESE
15 ANDY TOBIN

16 IN THE MATTER OF THE APPLICATION
17 OF TUCSON ELECTRIC POWER
18 COMPANY FOR THE ESTABLISHMENT
19 OF JUST AND REASONABLE RATES
20 AND CHARGES DESIGNED TO REALIZE
21 A REASONABLE RATE OF RETURN ON
22 THE FAIR VALUE OF THE PROPERTIES
23 OF TUCSON ELECTRIC POWER
24 COMPANY DEVOTED TO ITS
25 OPERATIONS THROUGHOUT THE
STATE OF ARIZONA AND FOR RELATED
APPROVALS.

Docket No. E-01933A-15-0239

Docket No. E-01933A-15-0322

**REPLY BRIEF OF SOUTHWEST
ENERGY EFFICIENCY PROJECT,
WESTERN RESOURCE
ADVOCATES AND ARIZONA
COMMUNITY ACTION
ASSOCIATION**

Arizona Corporation Commission

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Southwest Energy Efficiency Project (SWEEP)

The Southwest Energy Efficiency Project (SWEEP) will address and reply to the initial briefs regarding the issues of recovering energy efficiency program costs in base rates, the need for increased transparency of costs to customers, and the TEP-proposed prepay tariff and enhanced education program.

1 increases transparency.⁴ TEP fails to address the two primary issues and facts that
2 SWEEP has put on the record: that the cost recovery approach used by TEP for
3 energy efficiency is inequitable and inconsistent relative to the treatment of other
4 energy resources; and that TEP is addressing its stated concerns about “transparency”
5 of costs in an inconsistent and incomplete manner.⁵ Both of these inequities and TEP
6 inconsistencies should be resolved by adopting SWEEP’s recommendations in this
7 case: to recover the energy efficiency program costs in base rates, and to increase the
8 transparency of energy resource costs in an equitable and consistent manner (see
9 below).
10

11 **2. TEP Should Treat All Energy Resources Equitably in Terms of Transparency on**
12 **Customer Bills and in Customer Communications**

13 In his testimony, Mr. Schlegel provided recommendations to the Commission
14 to ensure that TEP treats the costs of all energy resources equitably in terms of
15 disclosure and transparency on customer bills and in customer communications.⁶
16 Currently, TEP does not provide any such transparency regarding the ratepayer costs
17 of other major energy resources – on the utility bill or in any other manner.⁷ Staff
18 witness Van Epps acknowledged that the costs of other major energy resources are
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22 ⁴ TEP Initial Brief, p. 11.

23 ⁵ Jeff Schlegel oral testimony, September 12, 2016; and SWEEP Direct Testimony of Jeff
24 Schlegel, p. 8-9.

25 ⁶ Jeff Schlegel oral testimony, September 12, 2016; and SWEEP Direct Testimony of Jeff
Schlegel, p. 9-10.

⁷ Ibid. Also

1 not disclosed or transparent to customers.⁸ TEP continues to state that it wants to
2 provide transparency regarding the costs of energy efficiency programs to customers,
3 but apparently TEP's interest about transparency to customers applies to energy
4 efficiency and does not apply to other, more costly resources.⁹ This approach of TEP
5 is biased, is not "transparent," is not in the public interest, and should be
6 corrected.

7
8 SWEEP continues to recommend that TEP provide transparency regarding the
9 ratepayer costs of all major energy resources in a consistent and unbiased manner.
10 SWEEP recommended that the Commission should order TEP, within 120 days of the
11 Commission order in this proceeding, to file a proposal to provide information to
12 customers on the ratepayer costs of major energy resources at all times via the web,
13 and quarterly or annually via a bill insert, email, and/or other communication.¹⁰ TEP
14 should convene a stakeholder group to offer input on how best to provide the
15 information, and to review and comment on options and work products.¹¹

23 ⁸ Tr. at 2873

24 ⁹ TEP Brief, p. 11.

25 ¹⁰ SWEEP Surrebuttal Testimony of Jeff Schlegel, pg. 3; and Schlegel oral testimony,
September 12, 2016.

¹¹ Ibid.

1 **3. The Enhanced Education and Behavior Aspects of TEP’s Proposed Prepay**
2 **“Program” – the Enhanced Education Offering – Should be Made Available to**
3 **All Customers.**

4 TEP plans to propose an optional prepay “program” in its Energy Efficiency
5 Implementation Plan docket as a part of its portfolio of programs.¹² TEP has also
6 included a prepay tariff in its rate case application.¹³

7
8 Mr. Schlegel and Mr. Baatz testified to SWEEP’s significant concerns about
9 prepay programs and tariffs, and to the importance of adequate consumer protections
10 and effective education.¹⁴ Mr. Schlegel also recommended that TEP’s prepay efforts
11 be treated as two distinct offerings to customers: (1) An optional prepay tariff, to be
12 treated as a tariff and not a “program;” and (2) An enhanced customer education,
13 information, and behavior feedback program to encourage customers to manage and
14 reduce their energy bills and costs.¹⁵ Any customer choosing to be on the optional
15 prepay tariff should receive the enhanced customer education, information, and
16 feedback services, in addition to the appropriate consumer protections.¹⁶ This is a
17 must and should be required by the Commission. In addition, the enhanced customer
18 education, information, and feedback program to be reviewed and approved by the
19 Commission as part of the Energy Efficiency Implementation Plan process should be
20 made available to all residential customers, so that all customers have the opportunity
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23 ¹² TEP-34 (Smith Rebuttal), p. 3 and 10.

24 ¹³ Ibid.

25 ¹⁴ Jeff Schlegel oral testimony, September 12, 2016; Direct Testimony of Jeff Schlegel, p.
14-15; and Direct Testimony of Brendon Baatz, p. 30-32.

¹⁵ Ibid.

¹⁶ Ibid.

1 to benefit from the enhanced education and behavior feedback.¹⁷ This enhanced
2 education and feedback program, if approved, should not be limited solely to
3 customers who elect to be on the optional prepay tariff. If the education and feedback
4 services are providing cost-effective benefits to customers, then the cost-effective
5 services should be offered to all customers.¹⁸

6 TEP did not address or oppose SWEEP's recommendations in its brief. The
7 Commission should adopt SWEEP's recommendations because they are in the public
8 interest and would provide all customers with opportunities for additional educational
9 benefits.¹⁹

10 In addition, as Mr. Baatz testified, the prepay tariff and associated rates (e.g.,
11 the higher BSC proposed by TEP) should reflect the cost savings to TEP.²⁰

12 **Southwest Energy Efficiency Project (SWEEP) and Western Resource Advocates**
13 **(WRA) – Rate Design**

14 The Southwest Energy Efficiency Project (SWEEP) and Western Resource
15 Advocates (WRA) address and reply to the initial briefs regarding the issues of the basic
16 service charge for residential and small general service customers, and time-of-use rates.

17 **1. Large Increases in the Basic Service Charge (BSC) for Residential and Small**
18 **General Service Customers are Not in the Public Interest and Should Not be**
19 **Approved. The Basic Service Charge (BSC) Should be Determined Using the**
20 **Basic Customer Method.**

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24 ¹⁷ Ibid.

25 ¹⁸ Ibid.

¹⁹ TEP Brief, p. 28.

²⁰ Surrebuttal Testimony of Brendon Baatz on behalf SWEEP and WRA, p. 21.

1 In his written and oral testimony, Mr. Baatz explained and documented SWEEP
2 and WRA's opposition to an increased basic service charge (BSC).²¹ Specifically,
3 SWEEP and WRA do not support higher BSCs for customers, particularly not the 50%
4 increase in the BSC proposed by TEP (TEP rejoinder position) nor the 100% increase
5 proposed initially by TEP. Further, SWEEP and WRA support the use of the basic
6 customer method for determining the level of the basic service charge. Mr. Baatz
7 concluded that TEP's proposal is not in the public interest; is not equitable; violates the
8 rate design principle of gradualism; and violates a primary Bonbright criteria of
9 ratemaking to discourage wasteful use of public utility services.²²

10 RUCO, SWEEP, WRA, and other major parties focused on the customer and
11 public interest in this case support the basic customer method as the correct method to
12 use to determine the BSC. Employing the basic customer method would result in a
13 residential BSC that is \$10 or less.

14 TEP's critique of the basic customer method contains misrepresentations of the
15 facts.²³ The basic customer method is not intended to recover 100% of the unavoidable
16 fixed system costs needed to serve a customer. As Mr. Baatz testified, it is intended to
17 recover customer-specific costs, those that vary with the number of customers on the
18 system.²⁴ The basic customer method is also the most equitable method proposed in the
19 case.²⁵ Including distribution plant in the basic service charge would overcharge many
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21 ²¹ Brendon Baatz oral testimony, September 12, 2016; Direct Testimony of Brendon
22 Baatz on behalf SWEEP and WRA, p. 5-20; and Surrebuttal Testimony of Brendon Baatz
23 on behalf SWEEP and WRA, p. 3-14.

24 ²² Ibid.

25 ²³ TEP Brief, p. 23.

²⁴ Brendon Baatz oral testimony, September 12, 2016; Direct Testimony of Brendon
Baatz on behalf SWEEP and WRA, p. 5-20; and Surrebuttal Testimony of Brendon Baatz
on behalf SWEEP and WRA, p. 3-14.

²⁵ Ibid.

1 customers for service, especially customers in multifamily housing. The minimum system
2 method does not account for the differences in population density and is therefore highly
3 flawed and will overcharge some customers (thereby undercharging others). The basic
4 customer method is the only method that accurately reflects cost causation because it is
5 the only method that actually limits the basic service charge to customer costs only, as
6 intended, as appropriate, and by design.²⁶

7 TEP also continues to assert the alleged \$87 per month of fixed costs to serve each
8 residential customer.²⁷ It is critical for the Commission to remember that these are sunk
9 costs, not fixed costs. While the cost of service for TEP may be fixed in the short term, it
10 is not in the long term. The price signals sent to customers using higher basic service
11 charges do not reflect that in the long term the costs are variable, not fixed.²⁸ Rates
12 should reflect this economic reality.²⁹

13 TEP states that, "Concerns that increasing the basic service charge will reduce
14 customer incentives to conserve energy are simply a red herring."³⁰ This statement is
15 entirely incorrect. Increasing the basic service charge alters the economics of energy
16 efficiency investments and the price signal to conserve energy. A primary reason people
17 engage in energy efficiency is to save money. Reducing the amount of money a customer
18 can save through rate design, reduces the customer incentive to conserve energy, as
19 simply math shows.³¹

21 ²⁶ Ibid.

22 ²⁷ TEP Brief, p. 23.

23 ²⁸ Brendon Baatz oral testimony, September 12, 2016; Direct Testimony of Brendon
24 Baatz on behalf SWEEP and WRA, p. 5-20; and Surrebuttal Testimony of Brendon Baatz
25 on behalf SWEEP and WRA, p. 3-14.

26 ²⁹ Ibid.

27 ³⁰ TEP Brief, p. 23.

28 ³¹ Oral testimony of Brendon Baatz and Jeff Schlegel, September 12, 2016.

1 The red herring in this case is TEP's desire to achieve more revenue certainty by
2 attempting to disguise their proposals for higher customer charges as based on cost
3 causation. The basic customer method is the appropriate and correct method to use for
4 determining the basic service charge, it is consistent with principles of cost causation, and
5 it is in the public interest.³²

6 Consistent with the basic customer method and the analysis and calculations of Mr.
7 Baatz,³³ the BSC should be \$10 or less for residential customers, and around \$15.50 for
8 small general service customers, based on the compromise offered by Mr. Schlegel
9 during oral testimony.³⁴

10 Mr. Schlegel also addressed the proposal to offer a different BSC for TOU rates as a
11 financial incentive to encourage TOU enrollment. Mr. Schlegel recommended the
12 following: (1) The BSC should remain at \$10 for standard, non-TOU customers, based on
13 the facts in the record and consistent with employing the basic customer method to
14 determine the BSC. (2) If the Commission determines it wants to provide a financial
15 incentive through the level of the BSC, then the BSC for TOU rates could be *lowered* to
16 \$7 as a positive incentive to encourage customers to enroll in TOU rates.³⁵ TEP's
17 proposal to increase the BSC for non-TOU customers is not based on the facts or
18 calculations in the case; it is simply an arbitrary increase in the customer charge.

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³² Ibid.

24 ³³ Brendon Baatz oral testimony, September 12, 2016; Direct Testimony of Brendon
Baatz, p. 7-14.

25 ³⁴ Jeff Schlegel oral testimony, September 12, 2016.

³⁵ Ibid.

1 **4. Properly Designed Time-of-Use (TOU) Rates with Lower Basic Service**
2 **Charges (BSCs) are a Superior Alternative to the Company's Proposal to**
3 **Implement Higher Fixed Charges.**

4 In their written and oral testimony, Mr. Schlegel and Mr. Baatz testified that
5 SWEEP and WRA recommend properly designed time-of-use (TOU) rates with lower
6 BSCs and shorter on-peak windows as a superior alternative to rate designs with higher
7 fixed charges and higher BSCs.³⁶ Effective, customer-friendly TOU rates give customers
8 more control over their energy bills; have less harmful impacts on lower usage
9 customers; help reduce wasteful energy use and peak demand by sending strong price
10 signals; and give TEP a reasonable opportunity to recover its authorized costs. As such,
11 properly designed TOU rates align the interests of the Company with the interests of its
12 customers.³⁷

13 Effective, customer-friendly TOU rates are also necessary in order to achieve
14 significant reductions in peak demand. To achieve significant peak demand reductions,
15 large numbers of TEP customers must subscribe and respond to TOU rates. This outcome
16 necessitates TOU rates that are customer-friendly and effective.³⁸ Mr. Schlegel and Mr.
17 Baatz documented SWEEP and WRA's recommendations for implementing effective,
18 customer-friendly TOU rates.³⁹

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22 ³⁶ Brendon Baatz oral testimony, September 12, 2016; Direct Testimony of Brendon
23 Baatz, p. 7-14; Jeff Schlegel oral testimony, September 12, 2016; and Surrebuttal
24 Testimony of Jeff Schlegel, p. 5-6.

25 ³⁷ Ibid.

³⁸ Jeff Schlegel oral testimony, September 12, 2016.

³⁹ Brendon Baatz oral testimony, September 12, 2016; Direct Testimony of Brendon
Baatz, p. 7-14; Jeff Schlegel oral testimony, September 12, 2016; and Surrebuttal
Testimony of Jeff Schlegel, p. 5-6.

1 The TEP TOU rate will not be effective, despite TEP's arguments.⁴⁰ Mr. Schlegel
2 testified that TEP's proposed TOU rate is not customer friendly or effective because the
3 proposed on-peak periods are too long and the differential between on- and off-peak rates
4 is insufficient to drive customer behavior change.⁴¹ He also testified that the RUCO-
5 proposed TOU rate is the best available rate design on the record, including the retention
6 of the three tiers, and SWEEP and WRA continue to support the RUCO TOU proposal.
7 However, the RUCO-proposed rate would be more effective for a larger number of
8 customers if it employed a shorter on-peak window (3 hours versus 4 hours).⁴²

9 Mr. Schlegel addressed the proposal to offer a different BSC for TOU rates as a
10 financial incentive to encourage TOU enrollment. Mr. Schlegel recommended the
11 following: (1) The BSC should remain at \$10 for standard, non-TOU customers, based on
12 the facts in the record and consistent with employing the basic customer method to
13 determine the BSC. (2) The BSC for TOU rates could be *lowered* to \$7 as a positive
14 incentive to encourage customers to enroll in TOU rates.⁴³ The \$10 (or lower) BSC
15 covers the basic customer costs as determined using the basic customer method. It is not
16 appropriate or in the public interest to artificially increase the BSC to a level higher than
17 \$10, including for customers who choose not to enroll in time-of-use rates. If the
18 Commission determines it wants to provide a financial incentive through the level of the
19 BSC, then the \$10 should remain for the standard, non-TOU customers, based on the
20 facts and analysis in this case, and the BSC for TOU rates could be *lowered* to \$7 as a
21 positive financial incentive.

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24 ⁴⁰ TEP Brief, p. 25

25 ⁴¹ Ibid.

⁴² Ibid.

⁴³ Ibid.

1 **Arizona Community Action Association (ACAA)**

2
3 ACAA will address comments regarding the basic service charge, residential rate
4 tiers, the Lifeline rate, and Prepaid Energy Service from TEP, RUCO, Staff, and Mr.
5 Plenk.

6 **Basic Service Charge:**

7 ACAA does not support increasing the basic service charge for low-income
8 customers. An increase in the basic service charge disproportionately affects low-use
9 customers, many of whom are low-income customers. In its brief, TEP stated that
10 approximately a third of its bills in the test year were for 400 kWh or less, assuming that
11 these must be vacant or seasonal homes. They assumed full requirements customers
12 would have to use more electricity than this. In fact, many low-income customers have a
13 monthly usage equal to or less than 400 kWh. According to the EIA's Residential
14 Electric Consumer Survey, 9% of low-income customers in Arizona use 400 kWh or less.
15 These bills represent real customers who are doing their best to manage their budget and
16 conserve energy. Increasing the basic service charge has the unfortunate effect of making
17 it that much more difficult for low-use low-income customers to pay their bills.
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20 As ACAA explained in its initial brief, there's simply not enough low-income
21 assistance to properly aid everyone who needs it. It is imperative that affordability be
22 considered in ratemaking. Increasing the basic service charge makes rates less
23 affordable, taking away customer control over their bill and decreasing the incentive to
24 properly conserve energy. As justification for the basic service charge increase, the
25

1 Company said that “customers have access to a burgeoning market of distributed energy
2 resources and demand management opportunities.” This may be true for the majority of
3 TEP’s customers, but such advanced technology is simply out of the question and out of
4 the budget for low-income customers. RUCO, in its brief, said “a customer who uses 500
5 kWh a month. By including distribution system costs in the fixed charge, these low-
6 income, low-use customers are paying more than they should to consume electricity.
7 ACAA supports the SWEEP/WRA analysis, stating that the fixed charge should not be
8 more than \$10 for low-income customers. To quote RUCO again, “[c]oncentrating bill
9 increases on lower usage customers is a regressive policy that should be avoided.”
10 ACAA agrees wholeheartedly with this statement, and asks that the Basic Service Charge
11 remain at \$10 for low-income customers.
12

13 **Residential Rate Tiers**

14 ACAA agrees with RUCO, SWEEP, and WRA that the third tier should not be
15 eliminated. Only having two tiers for the residential rate would push even more cost
16 recovery onto lower-use customers. According to the EIA, 49% of all Arizona residents
17 use less than 1000 kWh per month, while 65% of low-income customers use less than
18 1000 kWh per month. Decreasing the number of tiers makes low-use bills less
19 affordable, creating a disproportionate burden for low-income customers. As
20 affordability must be considered in the rate design, the third tier should not be eliminated.
21
22

23 **Lifeline Rate**

24 In TEP’s brief, the Company described its plan to move Lifeline customers to a
25 standard residential rate and then provide a flat monthly discount. The Company is

1 proposing four different levels of monthly discounts \$15, \$18, \$30, and \$40. This is
2 intended to accommodate frozen Lifeline customers so as to avoid rate shock. This is a
3 great start for the frozen rates; it should be expanded to all Lifeline customers through the
4 tiered rate discount ACAA has proposed. The customers at less than 50% of the Federal
5 Poverty Guideline (FPG) would receive \$40/month discount, the customers from 51-
6 100% FPG would receive \$30/month discount, and the households from 101-150%
7 would receive \$15/month discount. The discounts are already in the system; all the
8 company would need to do is determine where the low-income household falls on the
9 federal poverty guideline by asking for income and number of people in the household.
10 With that information, customers could receive tiered discounts better designed to make
11 rates affordable, thus increasing the bill coverage ratio, keeping customers connected and
12 decreasing the customer service and collections costs to serve these customers.
13

14
15 Additionally, in TEP's brief, the Company mentioned several hundred customers
16 who would experience significant bill shock if this proposal goes forward. ACAA
17 supports increasing the discount for these customers so as to hold them harmless from the
18 proposed increase.

19
20 Regarding Lifeline enrollment, TEP stated it is "willing to look into ways to
21 increase Lifeline enrollment." ACAA appreciates the sentiment, but as Ms. Zwick has
22 stated previously, there is simply too much need in this community to simply "look into"
23 the issue. Concrete steps must be taken to ensure that eligible customers are able to
24 receive the Lifeline discount. One possible path to this is implementing automatic
25 enrollment, which has been successful at other utilities.

1 In Mr. Plenk's brief, he discussed exploring programs to increase solar penetration
2 among TEP's low-income customers. He goes on to suggest that "a pilot program of this
3 sort might even include transferring some funds from the Lifeline budget to study direct
4 solar support for low-income customers." If this idea were to go forward, ACAA would
5 not support diverting Lifeline funds to study new implementation options. Since the
6 Lifeline program currently supports so few of the eligible customers, ACAA believes it's
7 unwise to divert that money away from the low-income customers in order to study new
8 programs. While ACAA believes a study may be useful, it requests that the Lifeline
9 funding not be used for this purpose.
10

11 **Prepaid Electric Service**

12 The Company's brief advocates for implementing the prepaid electricity service
13 program. Before addressing the contents of the brief, it's worth noting that prepaid
14 energy already exists for TEP customers. Section 11.D.3 of TEP's rules and regulations
15 says that "[c]ustomers may pay for electrical service by making advance payments."
16 Prepaid energy has been available this whole time. What's truly new is the Commission
17 waiving customer protections regarding written disconnect notices so that customers'
18 power shuts off when the balance reaches zero, and charging customers more for the
19 service.
20
21

22 TEP's brief mentions that "[e]ven on cross-examination, ACAA witness Cynthia
23 Zwick admitted that the program provided options and would benefit some customers
24 that participate." With the additional \$5 fixed charge per month, more frequent
25 payments and more frequent trips to make payments, prepaid energy costs more than

1 post-pay energy given the same consumption. From economic theory, raising the price of
2 a good, all else being equal, decreases the total social welfare of the market for that good.
3 So technically, everyone is made worse off from an economic perspective. As Ms.
4 Zwick stated, it's entirely possible that some customers may do well with this program in
5 spite of its many shortcomings; however, on balance, the program will do more harm
6 than good, frequently leaving vulnerable customers in the dark. As such, it should not go
7 forward.
8

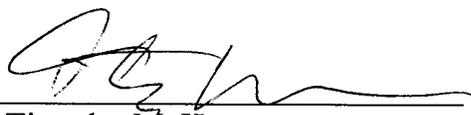
9 Ms. Smith stated that the prepaid electricity service "promotes energy
10 conservation." This statement is contrary to Staff's analysis of the program, saying
11 "[s]taff maintains [prepaid energy service] is a billing option, not an EE program as the
12 perceived energy conservation may simply be a result of customers running out of money
13 and being disconnected."
14

15 The Company has said multiple times that "the proper venue for debating the
16 prepay program's merits as an energy conservation program is within the DSM planning
17 process." It will certainly have to be explored further in the DSM process, but testimony
18 from Ms. Smith suggests it should be considered now as well. In Ms. Smith's rebuttal
19 testimony to Matt Connolly, she said "The daily view of energy use that customers
20 receive with a Prepay option is a powerful behavioral EE program, as it can produce a
21 greater awareness of daily energy consumption, allowing the customer to modify their
22 energy usage as they deem appropriate. **Without approval as an EE program,**
23 **economic justification of those tools would be more difficult to make them available**
24 **to customers."** From this testimony it appears that being part of the DSM
25

1 implementation plan is critical to purchasing the advanced metering technology required
2 to implement the program. If it turns out that prepaid energy is found not to be energy
3 efficient, at best the company would have a rate it couldn't use, and at worst it would
4 have purchased metering technology that was not economically justified. Seeing as Staff
5 has categorically denied that prepaid energy is a form of energy efficiency, it seems
6 unwise to move forward with the prepaid rate at this time.
7

8 DATED this 14th day of November, 2016.

9 ARIZONA CENTER FOR LAW IN
10 THE PUBLIC INTEREST

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All Parties of Record

