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March 3, 2017

Arizona Corporation Commission

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Docket Control  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

Re: *Cooperatives' Comments on the Letter from Commissioner Burns Dated February 15, 2017 Regarding Rulemaking Proceeding on the Development of Transparency and Disclosure Rules; Docket No. RU-00000A-17-0035*

Dear Sir/Madam:

The Grand Canyon State Electric Cooperative Association ("GCSECA"), on behalf of its Arizona cooperative members,<sup>1</sup> submits these comments in response to the letter from Commissioner Burns dated February 15, 2017 in Docket No. RU-00000A-17-0035 ("Letter"). While GCSECA is an association of the Electric Cooperatives formed in the State of Arizona, it is not a public service corporation and therefore not regulated by the Arizona Corporation Commission ("ACC"). GCSECA's members have requested that GCSECA prepare a response on their behalf to the Letter to address the topics raised in the letter as follows.

Concerning Commissioner Burns' first topic regarding policies and practices regarding political contributions, GCSECA and its members have not made and do not intend to make future campaign contributions to ACC candidates or elected Commissioners through GCSECA's Political Action Committee ("PAC") or any other source of corporate funds. GCSECA and its members do not directly or indirectly make contributions through

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<sup>1</sup> The Arizona cooperative members are: Arizona Electric Power Cooperative, Inc.; Duncan Valley Electric Cooperative, Inc.; Graham County Electric Cooperative, Inc.; Graham County Utilities; Mohave Electric Cooperative, Inc.; Navopache Electric Cooperative, Inc.; Sulphur Springs Electric Cooperative, Inc.; and Trico Electric Cooperative, Inc. (collectively the "Electric Cooperatives").

independent expenditures, including contributions made to 501(c)(4) organizations for ACC Candidates or elected Commissioners campaigns. GCSECA has formed a PAC and does make campaign contributions and independent expenditures to other state candidates, all of which are reported to Arizona Secretary of State in compliance with the campaign finance laws of Arizona and that are outside the scope of the ACC's jurisdiction.

Concerning the second topic in the Letter, GCSECA and its members do not make contributions to 501(c)(3) organizations that are related in any way to ACC Candidates or elected Commissioners' political campaigns.

Concerning the third topic in the Letter, GCSECA and its members do not make contributions to civic events or organizations that are related in any way to ACC Candidates or elected Commissioners' political campaigns.

Concerning the fourth and sixth topics in the Letter, GCSECA and its members have registered lobbyists and report lobbying expenditures to the Arizona Secretary of State in compliance with the laws of Arizona.

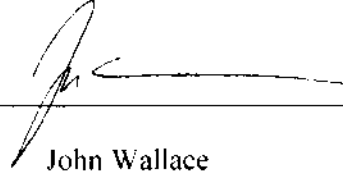
Concerning the fifth topic in the Letter, as a membership organization, GCSECA does not have marketing/advertising expenditures. GCSECA members have marketing/advertising expenditures related to the provision of service and safety, but such expenditures are not related in any way to ACC Candidates or elected Commissioners' political campaigns.

Finally, in light of the foregoing and considering the scope of this Docket as described in Commissioner Burns' Executive Summary, GCSECA and its members do not appear to be necessary parties to these proceedings. Therefore, GCSECA and its members may monitor this Docket and provide comments when appropriate, but do not intend to incur the expense associated with active participation unless so directed by the Commission.

RESPECTFULLY SUBMITTED this 3<sup>rd</sup> day of March, 2017.

GRAND CANYON STATE ELECTRIC  
COOPERATIVE ASSOCIATION

By



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John Wallace  
CEO

**Original and 13 copies** filed with Docket  
Control this 3<sup>rd</sup> day of March, 2017, with:

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1200 West Washington  
Phoenix, Arizona 85007