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February 5, 2018

Arizona Corporation Commission

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[Signature]

Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: **Docket No. AU-00000E-17-0079, Code of Ethics**

Dear Chairman Forese and Members:

I am writing today as a private citizen and submit these comments as an individual and not on behalf of any client. In March 2017, Commissioner Boyd Dunn opened docket AU-00000E-17-0079 to “develop and implement a code of ethics to guide [the corporation commission] in carrying out [its] constitutional and statutory duties.”

I propose the Arizona Corporation Commission adopt the Arizona Code of Judicial Conduct (Arizona Supreme Court, Rule 81, Rules of the Supreme Court, Amended November 24, 2009). The Judicial Code would serve as an effective guide-post for Corporation Commission members and the Commission on Judicial Conduct as the constitutionally created, independent state agency to investigate complaints of alleged unethical conduct.

Section 17 of Article 15 of the Arizona Constitution states, “Nothing herein shall be construed as denying to public service corporations the right of appeal to the courts of the state from the rules, regulations, orders, or decrees fixed by the corporation commission, but the rules, regulations, orders, or decrees so fixed shall remain in force pending the decision of the courts.”

Why not allow ratepayers and public service corporations to participate in a regulatory process with commissioners who follow the same “code of ethics” that is followed by every judge in Arizona?

As an Eagle Scout, attorney, member of the State Bar of Arizona, and Major in the United States Air Force Judge Advocate General (JAG) Corps Reserves, I am familiar with a variety of oaths and codes of conduct. The Arizona Code of Judicial Conduct stands tall as a time-tested ethical guide and includes:

Canon 1: A judge shall uphold and promote the independence, integrity, and impartiality and shall avoid impropriety and the appearance of impropriety

Canon 2: A judge shall perform the duties of judicial office impartially, competently, and diligently

Canon 3: A judge shall conduct the judge's extrajudicial activities to minimize the risk of conflict with obligations of judicial office

Canon 4: A judge or candidate for judicial office shall not engage in political or campaign activity that is inconsistent with the independence, integrity, or impartiality of the judiciary

The code's preamble states, "Judges should maintain the dignity of judicial office at all times, and avoid both impropriety and the appearance of impropriety in their professional and personal lives." Arizonans deserve a full adoption of the Arizona Judicial Code of Conduct by the Corporation Commission.

Thank you for your consideration,

Sincerely,

A handwritten signature in cursive script that reads "Rodney Glassman". The signature is written in black ink and is centered below the word "Sincerely,".