



COMMISSIONER BURNS PROPOSED AMENDMENT NO. 1

TIME/DATE PREPARED: 2:00 p.m. / March 9, 2018

COMPANY: Arizona Corporation Commission
(Resource Planning)

AGENDA ITEM NO.: 22

DOCKET NO.: E-00000V-15-0094

OPEN MEETING DATE: March 13, 2018

Purpose: This amendment would not acknowledge the plans due to the fact that the submitted integrated resource plans did not comply will all the requirements in the rules. The APS load forecasts were not proper because they are "too aggressive"; just as they were last time and as discussed by Staff in Finding of Fact #256. In addition, the LSE's relied heavily on natural gas without adequate price sensitivity analyses as discussed by Staff in Finding of Fact #266.

Page 47, Line 11, Insert new Finding of Fact:

The Commission's Rules require a determination by the Commission whether each IRP filed by the LSEs complies with the requirements of the Rules. We find that of the 11 factors summarized in Finding of Fact 4, the APS IRP failed to comply with B, D, I and K. In addition, Decision No. 75068 required APS to reexamine its load forecasting techniques prior to filing its IRP. As noted by Staff and the Sierra Club, APS's forecasted load growth appears too aggressive. This overstatement of growth as well as the apparent lack of compliance with Decision No. 75068 support the decision to decline to acknowledge APS's IRP. Consequently, there can be no coordinated efforts with other LSEs, because the APS IRP is based on faulty and/or unrealistic load growth. We disagree with Staff's recommendation and based on the information provided by the LSEs, we find that is it in the public interest to decline acknowledgement of any of the IRPs as filed.

Page 47, Line 22, Insert the words "do not" after the words "Integrated Resource Plans".

Page 50, Line 4, Insert the words "does not" after the word "Commission."

Arizona Corporation Commission

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[Signature]

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**** Make all conforming changes**

THIS AMENDMENT:			
_____ Passed _____	Passed as amended by _____		
_____ Failed _____	_____ Not Offered _____	_____ Withdrawn _____	