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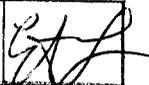
BEFORE THE ARIZONA CORPORATION COMMISSION

SUSAN BITTER SMITH
Chairman
BOB STUMP
Commissioner
BOB BURNS
Commissioner
DOUG LITTLE
Commissioner
TOM FORESE
Commissioner

Arizona Corporation Commission

DOCKETED

MAY 08 2015

DOCKETED BY 

IN THE MATTER OF RESOURCE
PLANNING AND PROCUREMENT IN
2013 AND 2014

DOCKET NO. E-00000V-13-0070

DECISION NO. 75068

ORDER

Open Meeting
April 14, 2015, and April 15, 2015
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. The Utilities Division Staff ("Staff") and its consultants Global Energy & Water Consulting, LLC and Evans Power Consulting, Inc. ("Consultants") have completed the Assessment of the 2014 Integrated Resource Plans of the Arizona Electric Utilities ("Assessment") as required by Arizona Administrative Code ("A.A.C.")R14-2-704(A). The Assessment has been filed in the docket (December 19, 2014) and has also been posted on the Arizona Corporation Commission ("Commission") website at:

<http://www.azcc.gov/Divisions/Utilities/Electric/IRP2012.asp>.

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1 Background

2 2. The Assessment represents the opinion of Staff and its Consultants. The Assessment
3 is not an evaluation of individual electric service providers' facilities or quality of service. The
4 Assessment does not set Commission policy or approve of any plan or specific project(s). Rather, it
5 assesses the adequacy of the Integrated Resource Plans ("IRP" or "IRPs") to meet the requirements of
6 the Commission's Resource Planning and Procurement Rules. The IRPs have been prepared by the
7 four Load-Serving Entities ("LSE" or "LSEs") as defined in the Rules. The LSEs are Arizona
8 Electric Power Cooperative ("AEPCO"), Arizona Public Service Company ("APS"), Tucson Electric
9 Power Company ("TEP"), and UNS Electric, Inc. ("UNSE"). In addition, the second largest electric
10 utility in Arizona, Salt River Project ("SRP"), which is not subject to these rules and regulations of the
11 Commission and is not required to file an IRP, has voluntarily supplied certain information that is
12 included in the Assessment.

13 3. An IRP is essentially the utility's plan to meet the future electric needs of its customers
14 in a way that considers environmental impacts along with the concerns of customers, regulators,
15 stockholders and other stakeholders. Within the IRP, the selection of ways to reduce, or shift electric
16 usage (demand-side resources) are weighed in an equitable fashion against ways to increase the
17 production of electricity (supply-side resources). The bottom line of an IRP is a schedule of demand-
18 side and supply-side resources that will provide for the continued reliable delivery of electricity to all
19 customers in Arizona.

20 4. The Commission's rules include certain filing requirements and require the
21 Commission to determine whether each IRP complies with the requirements of the rules and is
22 reasonable and in the public interest based on the information available to the Commission at the
23 time, considering the following factors:

- 24 A. The total cost of electric energy services;
- 25 B. The degree to which the factors that affect demand, including demand management,
26 have been taken into account;
- 27 C. The degree to which supply alternatives, such as self-generation, have been taken into
28 account;

1 D. Uncertainty in demand and supply analyses, forecasts, and plans, and whether plans are
2 sufficiently flexible to enable the utility to respond to unforeseen changes in supply and
3 demand factors;

4 E. The reliability of power supplies, including fuel diversity and non-cost considerations;

5 F. The reliability of the transmission grid;

6 G. The environmental impacts of resource choices and alternatives;

7 H. The degree to which the LSE considered all relevant resources, risks, and uncertainties;

8 I. The degree to which the LSE's plan for future resources is in the best interest of its
9 customers;

10 J. The best combination of expected costs and associated risks for the LSE and its
11 customers; and

12 K. The degree to which the LSE's resource plan allows for coordinated efforts with other
13 LSEs.

14 5. In addition, each IRP (other than AEPCO's) must meet the requirements of the
15 Annual Renewable Energy Requirement, the Distributed Renewable Energy Requirement, and the
16 Energy Efficiency Standard.

17 6. The Commission's decision in the initial IRP docket (2012 IRP filings, Decision No.
18 73884) acknowledged the IRPs of all four load-serving entities, and required that APS, TEP and
19 UNSE address the issues identified in the 2012 Integrated Resource Planning Assessment in their
20 2014 IRPs. The Decision also ordered that TEP include a coal fleet retirement scenario in its 2014
21 IRP. Concerning AEPCO, the Commission acknowledged the special circumstances concerning
22 AEPCO, namely that AEPCO does not serve any retail load and its wholesale, supply-only role has
23 declined dramatically since 2001. Therefore, the Commission ordered AEPCO to file whatever
24 information, data, criteria, and studies it has used in its 15-year planning studies and that future
25 AEPCO IRPs need not be acknowledged by the Commission.

26 7. Finally, Decision No. 73884 requires that each load-serving entity with possible extra
27 capacity resulting in a reserve margin beyond 20% over a period of two years must include an
28 alternative scenario in its IRP, in which any incremental additions of capacity, mandated or not, that

1 contribute to the possible extra capacity, are delayed until such additions no longer contribute to the
2 additional capacity. The costs of this alternative scenario, including projected revenue requirements,
3 must be included in the IRP.

4 The IRPs

5 8. All four LSEs filed the required 2014 resource plans in the docket on April 1, 2014.
6 APS amended its IRP on September 7, 2014. The purpose of APS's amendment was to select a
7 different portfolio of resources (from the original "Selected Portfolio" to the "Managed Coal
8 Strategy"), and to request specific Commission approval of APS's decision to retire the coal-fired
9 Cholla Power Plant Unit 2, as provided in A.A.C. Rule R14-2-704(E).

10 9. Staff held two workshops to gather stakeholder input. The first workshop was held on
11 September 11, 2014, and the second on November 7, 2014. The comments and presentations
12 submitted at the workshops, materials filed in the docket and with Staff, and subsequent
13 correspondence have been reviewed and incorporated in the Assessment where appropriate.

14 10. A total of eight parties were granted intervenor status: the Arizona Competitive Power
15 Alliance; the Solar Energy Industries Association ("SEIA"); the Southwest Energy Efficiency Project
16 ("SWEET"); Western Resource Advocates ("WRA"); the Residential Utility Consumer Office
17 ("RUCO"); Gila River Power, LP; and Freeport-McMoRan Copper & Gold, Inc. ("Freeport").

18 Assessment Conclusions

19 11. Staff and the Consultants believe that the 2014 Integrated Resource Plans produced by
20 APS, TEP and UNSE are reasonable and in the public interest based upon the information available
21 to the Staff at the time this report was prepared and the factors set out in R14-2-704(B). Staff believes
22 the IRPs of APS, TEP, and UNSE meet the requirements of the Commission's IRP rules and
23 recommends that the Commission acknowledge the IRPs of these companies. However, the
24 following issues have been identified concerning the IRPs of APS, TEP and UNSE:

25 APS

- 26 • Staff believes that the Ocotillo Modernization Project ("OMP") may offer a unique
27 opportunity to add capacity at a strategic location within the Phoenix Load Pocket. In
28 addition, existing Ocotillo site attributes such as the availability of water, natural gas,

1 and transmission infrastructure support the redevelopment activities proposed in the
2 OMP. Further, Staff recognizes that APS conducted a variety of economic feasibility
3 studies which point to the economic viability of the OMP.

- 4 • Staff notes that APS has volunteered to conduct an all-resources RFP process prior to
5 adding the additional 290 MW of capacity. Staff believes that the information derived
6 through the RFP process may provide useful information at such time that APS seeks
7 cost recovery of the OMP.
- 8 • Staff recommends that if APS believes such information would be useful in
9 demonstrating the prudence of the OMP, APS be allowed to conduct an all-resources
10 RFP prior to initiating construction, as it has volunteered to do.
- 11 • APS has requested that the Commission specifically approve the proposed retirement
12 of Cholla Unit 2 in April of 2016. APS cites the provisions of R14-2-704(E) as the
13 basis for this specific approval. Subsequent to the receipt of this request for specific
14 approval, Staff issued a set of Data Requests to APS inquiring, among other things,
15 whether APS would seek recovery of stranded costs associated with the Unit 2
16 retirement, and if APS understands that any Commission approval of the Cholla Unit
17 2 retirement under this IRP proceeding would not be considered an approval of the
18 prudence and cost of the retirement. APS responded affirmatively to both questions.
- 19 • Based on APS's recognition that the specific approval under this IRP proceeding of
20 the Cholla Unit 2 retirement in April 2016 is not an approval of the prudence or costs
21 associated with the retirement, Staff recommends that the Commission grant approval
22 of said retirement. However, this approval would not imply a specific treatment or
23 recommendation for rate base or rate making purposes in APS's future rate filings.

24 TEP and APS

- 25 • The TEP and APS load forecasts appear to be optimistic, in that both assume a rapid
26 return to historical load growth. Staff recommends that TEP and APS re-examine
27 their load forecasting techniques prior to the filing of the 2016 IRPs to ensure that
28 TEP and APS are not forecasting high load growth that is unlikely to occur.

AEPCO

- Staff finds that the information provided by AEPCO satisfies the requirements established in Decision No. 73884.

ALL LSEs

- In its filings in this docket, Western Grid Group discussed the possibility of Arizona utilities joining an Energy Imbalance Market (“EIM”). EIMs permit generators to balance the supply of electricity with demand over a large area, and may lead to increased efficiency and may provide benefits for integrating more variable energy resources. In particular, the California Independent System Operator’s (“CAISO”) EIM has been discussed as a potential market for Arizona utility participation. APS is currently evaluating joining an EIM and its potential impacts. APS explained that while it is considering joining CAISO’s EIM, it is concerned about that particular EIM’s operation because it includes participants both inside and outside of CAISO’s balancing area, which make its market rules uniquely complex. In its analysis, APS is evaluating and monitoring three primary issues. First are market economics, and APS states it is “reviewing production cost modeling studies and comparing operating costs within an EIM against a business as usual case.” Second are internal costs, so APS is working to identify and estimate the cost (both start up and on-going) of implementing an EIM. Finally, APS is seeking to understand the extensive list of market rules, charges, workflows, timelines, and their effects on traders, transmission operators, and scheduling coordinators. APS expects its analysis to be completed by spring of 2015. APS also plans to monitor PacifiCorp’s experience with CAISO’s EIM, as it is one of the largest utilities in the West and it joined the CASIO EIM on October 1, 2014. On September 16, 2014, TEP filed a document in Docket No. E-00000J-13-0375 (aka “Tech Docket”) regarding its evaluation of an EIM. In its filing, TEP cites its membership in the Southwest Variable Energy Resource Integration (“SVERI”) group, which is comprised of several large southwest utilities, including APS and TEP. SVERI’s purpose is to evaluate ways increased renewable generation can be handled

1 across the group's combined service territories. TEP states, "As a relatively small
2 utility, TEP is not prepared to assume a leadership position in embracing EIMs ahead
3 of our larger regional peers. We will continue to work with SVERI and others to
4 address the impact of intermittent renewable resources while evaluating NV Energy's
5 [a Nevada electric utility] and PacifiCorp's upcoming experience with the California
6 Independent System Operator's extension of an EIM for the region."

7 Staff believes that APS and TEP are diligently evaluating the costs and benefits of
8 joining an EIM. Therefore, Staff recommends that each LSE be directed to include a
9 discussion of the status of its EIM market participation deliberations in each update to
10 its respective IRP and 3-Year Action Plan.

11 IRP Process - Staff Concerns

12 12. During 2013, APS, TEP and UNSE each made important long-term decisions that
13 impact their IRP. APS made the decision in 2013 to carry out the OMP, which will add 290
14 megawatts of new capacity at the Ocotillo site. In the development of its 2014 IRP, APS has assumed
15 that this project will go forward in all scenarios studied. TEP and UNSE made the decision in 2013 to
16 acquire portions of the Gila River combined cycle merchant plant. In the development of their 2014
17 IRPs, TEP and UNSE assumed this purchase will be finalized in all cases studied.

18 13. Although these 2013 decisions by APS, TEP and UNSE may be entirely reasonable,
19 the decisions were made outside the IRP process and the economic consequences have not been fully
20 vetted in the context of an IRP. Staff believes that these types of resource decisions should be vetted
21 within the IRP process.

22 14. Staff's experience in the processing of these IRPs, as well as prior IRPs, has led Staff
23 to believe that the current IRP process does not properly incent participation by the utilities that are
24 subject to the IRP rules. There is no link between the IRPs prepared under the rules to subsequent
25 Commission approval processes for resource additions. Staff notes that the Commission's Biennial
26 Transmission Assessment effectively incents participation in that process by offering a firm and
27 mandatory link between a company's future transmission plans (as submitted in the required 10-year
28 transmission plans) and the Certificate of Environmental Compliance ("CEC") that is required to

1 implement the company's plan. There is no such link between the resource plans prepared under the
2 IRP process and the CEC process. This disconnect could lead to the entities filing IRPs that
3 technically meet the requirements of the IRP rules, but may not accurately reflect the entities' true
4 plans. The Commission may wish to consider implementing a link between the IRP and CEC
5 processes. This would likely best be pursued through legislation.

6 15. Another area of concern for Staff is the fact that the current IRP Rules only apply to
7 four load-serving entities (APS, TEP, UNSE, and AEPSCO). These four entities account for
8 approximately 60% of the total statewide electric generation. The Commission's IRP process does
9 not consider the generation capacity and loads of SRP, Independent Power Producers (aka merchant
10 generators), municipal power companies, electric service districts, or combined heat and power
11 producers. Therefore, the Commission's evaluation considers less than two-thirds of the electric
12 infrastructure in Arizona. Without being able to consider 100 percent of the state's generation
13 resources, the Commission cannot complete a true statewide review and assessment.¹

14 16. With the specter of Environmental Protection Agency Rule 111(d) requirements
15 looming, knowledge of Arizona's total planned resource mix will only increase in importance.

16 17. To enhance the "statewide" aspects of the IRP process, the Commission may want to
17 advocate statutorily expanding the jurisdiction of the Commission's IRP process to include 100
18 percent of statewide generation.

19 IRP Process - Stakeholder Concerns

20 18. Several stakeholders voiced concerns regarding the IRP process at the Workshop
21 meetings and in written comments filed in the docket. The nature of stakeholder concerns covers a
22 broad spectrum, including the following:

23 APS

- 24 • Increase transparency of IRP process
- 25 • Earlier input from Commission and stakeholders

26 ...

27 _____
28 ¹A.A.C. R14-2-704(A) provides as follows: " staff shall file a report that contains its analysis and conclusions regarding its statewide review and assessments of the load-serving entities filings..."

Freeport

- Overly optimistic load forecasts
- Lack of analysis regarding projected rate increases under various resource portfolio combinations
- Natural gas price forecasts in the IRPs are too high

Joint Comments – RUCO, SWEEP, SolarCity, SEIA, Western Grid Group, & WRA

- Inappropriate planning assumptions – load forecasts, resource costs, new technologies, future regulations, and customer preferences
- Disconnect between resource planning and resource procurement
- Insufficient Data and Analysis – need to understand and incorporate the trends shaping the industry
- Absence of independent analysis – use 3rd party analysis to improve objectivity, value and usefulness of the IRPs

SEIA

- Over reliance on natural gas in the IRPs

SWEEP

- Not enough consideration given to the premise that Energy Efficiency avoids investment in large baseload plants
- Capacity provided by demand side management investments from 2011-2013 is greater than recent proposed supply side additions that are comparatively more expensive
- Insufficient investment in energy efficiency (“EE”) in the IRPs

WRA

- Not enough consideration given to future natural gas cost volatility
- The IRPs load forecasts are overly optimistic

Stakeholder Recommendations

19. The majority of stakeholders filing comments in this docket also offered recommendations for addressing concerns and improving the IRP process. Staff commends the

1 stakeholders for their timely and informed comments and suggestions. The stakeholder
2 recommendations are summarized as follows:

3 APS

- 4 • Conduct Utility-Specific RFIs to gather market intelligence
- 5 • Pre-Filing workshops to define utility planning assumptions and resource needs
- 6 • Approval (rather than merely “acknowledgement”) of IRPs by the Commission
- 7 • Post-Commission approval and procurement – use competitive resource acquisition
- 8 RFP with oversight by an Independent Monitor.
- 9 • Expand the generation technologies subject to the CEC process

10 TEP & UNSE

- 11 • Implement pre-filing workshops
- 12 • Leverage the IRP process with the Biennial Transmission Assessment
- 13 • Include an evaluation of emerging grid technologies in the IRP

14 Joint Comments – RUCO, SWEEP, SolarCity, SEIA, Western Grid Group, & WRA

- 15 • Stakeholder workshops to define key assumptions
- 16 • Staff consultant to obtain information on costs and availability of various resources
- 17 • Staff’s consultant gathers and analyzes data, then recommends portfolio scenarios for
- 18 utility company analysis
- 19 • Commission approves 3-year Action Plan and acknowledges 15-year IRP
- 20 • Staff’s consultant reviews and verifies Action Plans
- 21 • The Commission, consultant, and stakeholders review and comment on resource RFPs
- 22 prior to release.
- 23 • Results of resource RFPs to be subject to review by an Independent Monitor and
- 24 Staff’s consultant

25 SWEEP

- 26 • Employ EE measures in excess of those required by the EE Standard

27 SEIA

- 28 • Use high renewable energy portfolios as base portfolio

- 1 • Focus Commission analysis on future risk and cost to ratepayers
- 2 • Update assumptions on future costs of solar
- 3 • Establish a method for quantifying the need for flexible generation resources and
- 4 mandate consideration of applicable technologies to meet this need

5 Western Grid Group

- 6 • Add a provision to IRP Order requiring APS to join an EIM by July 1, 2015, or
- 7 provide a report by that date explaining its reasons for the delay or decision not to join
- 8 an EIM.

9 WRA

- 10 • Examine portfolios that reduce reliance on natural gas

11 Staff Suggestions to Improve the IRP Process Based on Staff and Stakeholder Concerns

12 20. The concerns presented by Staff and the various stakeholders offer a number of
13 opportunities to possibly “fine tune” and improve the existing IRP process. Staff has prepared a list of
14 suggestions that attempt to address the concerns enumerated by parties to this docket.

15 21. First, APS, TEP, and UNSE could be ordered to hold public workshops prior to
16 commencing detailed scenario planning and analysis on their 2016 IRPs. Prior to the utility-hosted
17 pre-filing workshops, the Commission may opt to host its own public IRP workshop(s). The
18 workshop(s) could be used to provide clarity regarding what the Commissioners, Commission Staff,
19 stakeholders and interested parties want to see discussed at the utility-hosted pre-filing workshops.
20 The purpose of these “Pre-filing” workshops would be to provide stakeholders an opportunity to
21 discuss and describe key assumptions used in IRP development, including but not limited to: future
22 fuel prices, population growth rates, discount rates, how new technologies will be appraised, new
23 technology adoption rates, customer preferences, assessment of impacts of future state and federal
24 regulations, resource costs, best practices for Requests for Proposals, and load forecasts. The
25 workshop(s) would also be an opportunity to discuss and describe costs and resource portfolio
26 concepts at a point in the resource planning process when study of key variables can have the most
27 impact on the direction of future resource plans. APS, TEP, and UNSE should design these Pre-filing
28 Workshops to be interactive, inclusive and encourage discussion among a wide range of stakeholders.

1 Due to the scope of possible subjects to be covered, the Pre-filing Workshops may require a series of
2 meetings to adequately address stakeholder concerns and comments. The Companies should be
3 directed to file reports of the results of these workshops in the IRP docket. These reports should, at a
4 minimum, discuss the issues identified and debated, and provide an analysis of how stakeholder
5 concerns will be addressed in the Company's next IRP. The Commission may choose to host an
6 additional workshop or workshops at the conclusion of the utility-hosted workshops.

7 22. Second, there could be an increased level of scrutiny on each LSE's 3-Year Action
8 Plan which is filed as part of each LSE's IRP.² Emphasis should be placed on the accuracy, detail, and
9 timeliness of the 3-Year Action Plans and how the action plans implement the goals of the IRP. The
10 LSEs could be required to file amendments to 3-Year Action Plans whenever a substantive change
11 occurs in the near term resource plan. These amendments should include a narrative description of
12 any substantial changes to previously filed 3-Year Action Plans and a discussion of the resource
13 planning implications of the changes. All proposed resource additions could be required to first
14 appear and be discussed in the LSE's current 3-Year Action Plan as a prerequisite for filing an
15 application with the Commission for a Certificate of Environmental Compatibility. This requirement
16 might best be pursued through legislation.

17 23. The Commission could approve, approve with conditions, or disapprove each LSE's
18 3-Year Action Plan. This action would be distinct and separate from the Commission's decision to
19 "acknowledge" or "not acknowledge" the IRP.

20 24. The LSEs could be directed to place additional emphasis on the future risks and costs
21 to ratepayers for each resource portfolio presented in the IRP. In particular, the LSEs should expand
22 their sensitivity analyses to reduce risks associated with natural gas price volatility and of future load
23 forecasts.

24 25. Additionally, the LSEs should incorporate the portfolios listed below in their 2016
25 IRPs in addition to the portfolios they typically incorporate. Specifically, the LSEs should explain
26 how they considered portfolios emphasizing the technologies listed below. If the LSEs did not

27 ² 3-year Action Plans are required by A.A.C. R14-2-703(H). This rule state; "With its resource plan, a load-serving entity
28 shall include an action plan...that...covers the three-year period following the Commission's acknowledgment of the
resource plan."

1 include the following portfolios in their IRPs, they should indicate the reason(s) why they were
2 excluded:

- 3 (1) Energy Storage
- 4 (2) Small Modular Nuclear Reactors
- 5 (3) Expanded Renewables (including distributed resources): biogas, solar, wind, geothermal,
6 etc.
- 7 (4) Expanded Energy Efficiency/Demand Response/Integrated Demand Side Management
8 (which should include the effect of microgrids and combined heat and power)

9 Furthermore, the LSEs shall provide a thorough discussion regarding their plans for aging generation
10 plants in their 2016 IRPs. If an LSE intends to perform a major upgrade, excluding normal
11 maintenance or repairs, or retire an existing generation plant, this information should be included in
12 its 3-Year Action Plan, IRP and any updates thereto, prior to the utility taking action.

13 26. During the course of Staff's workshop meetings, there was confusion among several
14 parties as to the meaning and intent of the resource procurement section of the IRP Rules.
15 Specifically, several parties stated that the language in A.A.C. R14-2-705(B) regarding the requirement
16 of an RFP process when an LSE needs to acquire bulk energy and capacity is ambiguous. In order to
17 clarify the intent of this Rule, the LSEs could be directed to conduct an acquisition RFP for any bulk
18 acquisition of energy and capacity, whether the project is intended as a self-build project or not.

19 27. Several parties have suggested that the IRPs include a discussion of new technologies
20 that have the potential to dramatically affect the ways in which electricity is produced, stored, and
21 distributed. Staff agrees that a systematic review of the costs and benefits of new technologies could
22 be appropriately discussed within the context of the IRPs. The LSEs could be directed to include a
23 discussion of the development status and associated costs and benefits of new technologies in each
24 update to its IRP and associated 3-Year Action Plan. We believe the IRP docket is the most
25 appropriate venue for this information and will direct the LSEs to include a discussion of the
26 development status and associated costs and benefits of new technologies they are considering in their
27 2016 IRPs submitted for Commission consideration and associated 3-Year Action Plans, and any
28 updates thereto.

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1 and how those results will be incorporated into the 2016 load forecast. The reports will be subject to
2 review and examination by the Commission during the 2016 IRP proceeding.

3 IT IS FURTHER ORDERED that the Load Serving Entities shall include a discussion of the
4 status of their EIM market participation deliberations in the update to their respective IRP and 3-Year
5 Action Plans.

6 IT IS FURTHER ORDERED that Arizona Public Service Company, Tucson Electric Power
7 Company, and UNS Electric, Inc., shall hold public pre-filing workshops prior to detailed portfolio
8 planning and analysis in their future IRPs. The purpose of these pre-filing workshops would be to
9 provide stakeholders an opportunity to discuss and describe key assumptions used in IRP
10 development, including but not limited to: future fuel prices, population growth rates, discount rates,
11 how new technologies will be appraised, new technology adoption rates, customer preferences,
12 assessment of impacts of future state and federal regulations, resource costs, best practices for
13 Requests for Proposals, and load forecasts. These workshops would also be an opportunity to discuss
14 and describe costs and resource portfolio concepts at a point in the resource planning process when
15 study of key variables can have the most impact on the direction of future resource plans.

16 IT IS FURTHER ORDERED that prior to the utility-hosted pre-filing workshops, the
17 Commission may opt to host its own public workshop(s). The workshop(s) could be used to provide
18 clarity regarding what the Commissioners, Commission Staff, stakeholders and interested parties want
19 to see discussed at the utility-hosted workshops. The Commission may also choose to host an
20 additional workshop or workshops at the conclusion of the utility-hosted workshops.

21 IT IS FURTHER ORDERED that Arizona Public Service Company, Tucson Electric Power
22 Company, UNS Electric, Inc., and Arizona Electric Power Cooperative shall include a discussion of
23 the development status and associated costs and benefits of new technologies they are considering in
24 their 2016 Integrated Resource Plans submitted for Commission consideration and associated 3-Year
25 Action Plans, and any updates thereto.

26 IT IS FURTHER ORDERED that Arizona Public Service Company, Tucson Electric Power
27 Company, UNS Electric, Inc. and Arizona Electric Power Cooperative shall consider the following
28 portfolios in their 2016 Integrated Resource Plans in addition to the portfolios they typically

1 incorporate: (1) energy storage; (2) small nuclear reactors; (3) expanded renewables (including
2 distributed resources): biogas, solar, wind, geothermal, etc.; and (4) expanded energy
3 efficiency/demand response/integrate demand side management (which shall include the effect of
4 microgrids and combined heat and power). If the Load Serving Entities did not include these
5 portfolios in their Integrated Resource Plans, they shall indicate the reason(s) why they were excluded.

6 IT IS FURTHER ORDERED that each Load Serving Entity shall provide a thorough
7 discussion regarding its plans for aging generation plants in its 2016 Integrated Resource Plan. If a
8 Load Serving Entity intends to perform a major upgrade, excluding normal maintenance or repairs, or
9 retire an existing generation plant, this information should be included in its 3-Year Plan, Integrated
10 Resource Plan and any updates thereto, prior to the utility taking action.

11 IT IS FURTHER ORDERED that, as discussed in Findings of Fact 22 and 23, the Load
12 Serving Entities are put on notice that in subsequent IRPs increased emphasis will be placed on the
13 accuracy, detail and timeliness of the 3-Year Action Plans.

14 IT IS FURTHER ORDERED that the Load Serving Entities, except Arizona Electric Power
15 Cooperative, should file updates to the 3-Year Action Plans whenever a substantive change occurs in
16 the near term resource plan. These updates should include a narrative description of any substantial
17 changes to previously filed 3-Year Action Plans. This process is intended to apply to the current 3-
18 Year Action Plans filed with the IRPs acknowledged by this order and to the 3-Year Action Plans filed
19 with the next IRPs. Updates to the 3-Year Action Plans filed pursuant to the process shall not require
20 Commission or Staff approval or acknowledgement.

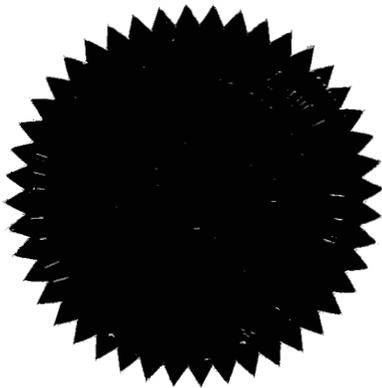
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1 IT IS FURTHER ORDERED that in future IRPs the Commission may approve, approve
 2 with conditions or disapprove each LSE's 3-Year Action Plan. Approval of the 3-Year Action Plans
 3 shall not constitute approval of any individual project for ratemaking purposes.

4 IT IS FURTHER ORDERED that this decision shall become effective immediately.

6 BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

7 *Susan Bitter Smith* *O'Brien*
 8 CHAIRMAN COMMISSIONER
 9
 10
 11 *[Signature]* *[Signature]* *[Signature]*
 COMMISSIONER COMMISSIONER COMMISSIONER



13 IN WITNESS WHEREOF, I, JODI JERICH, Executive
 14 Director of the Arizona Corporation Commission, have
 15 hereunto, set my hand and caused the official seal of this
 16 Commission to be affixed at the Capitol, in the City of
 17 Phoenix, this 8th day of May, 2015.

18 *Jodi Jerich*
 JODI JERICH
 EXECUTIVE DIRECTOR

19
 20 CONCURRING OPINION: *[Signature]*

21 DISSENT: _____

22 SMO:RBL :vsc/CHH

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1 SERVICE LIST FOR: RESOURCE PLANNING AND PROCUREMENT IN 2013 AND 2014
2 DOCKET NO. E-00000V-13-0070

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**ARIZONA CORPORATION
COMMISSION**

RE: Resource Planning and Procurement in 2013 and 2014, Docket No. E-00000V-13-0070

Concurrence by Commissioner Bob Burns

I appreciate the spirit of this decision and the adoption of my and Commissioner Little's amendments to the 2014 Integrated Resource Plan ("IRP") Staff proposed order. In my view, however, this decision does not accomplish what I sought to do by offering my amendments and supporting Commissioner Little's *original* amendments as written. I have two concerns with this decision. First, I believe we should have required the LSEs to do what we outlined in our amendments. Second, the deliberation process for discussing last minute changes to these amendments was inadequate.

As to my first point, I believe we have the authority and responsibility to require the Load Serving Entities ("LSEs") to comply with the items outlined in our amendments as originally drafted. Yet the Commission was cautioned it should not impose new requirements—most of which were requirements that all parties agreed would lead to an improved process—because it would be better accomplished in a rulemaking proceeding. In my opinion, stating that the LSEs *should* comply simply does not go far enough. I appreciate the LSEs' statements on the record that they will indeed comply with our requests but this is of little consolation to me. A firm requirement is preferable because years pass between our consideration of the IRPs. I fear we will forget or overlook the commitments made when the Commission considers the next IRPs. Isn't the purpose of our decisions to prevent just that? Isn't the purpose to provide clear guidance with respect to our expectations and the information we seek to obtain from the LSEs?

The constant theme throughout the 2014 IRP process was that there was significant room for improvement. This was only our second IRP process since the rules were adopted and many stakeholders and parties expressed extreme dissatisfaction with the current process. Yet the presumption was that such improvements can only occur in a rulemaking. However, because my fellow Commissioners supported the proposed changes which make compliance optional, I still offered my amendments and supported Commissioner Little's amendments because some improvements to the process are better than no improvements at all. It remains to be seen what we will see in the next IRP filings. Because I believe voluntary compliance is not enough, I give notice to my fellow Commissioners that I will be meeting with Staff to look into possible IRP rule changes. I hope this is something my fellow Commissioners are interested in, and I look forward to working with everyone to effect changes to enhance the IRP process and adequately incorporate the recommended changes discussed at Open Meeting.

I am also dissatisfied with this decision because our deliberation process for discussing the amendments and last minute changes thereto was inadequate. I have been thinking about and working on possible ways to improve the IRP process for months. However, the Open Meeting Law prevented me from discussing my thoughts and ideas with all of my fellow Commissioners until we were in Open Meeting, just minutes prior to voting on the IRPs. Unanticipated changes to my and Commissioner Little's amendments were offered at the last minute, which failed to provide adequate time for me to persuade my fellow Commissioners why we should not adopt these changes or even have a robust discussion about

them. The impediments we face to having thorough discussions about issues are disconcerting—especially given the significant upcoming decisions we will be making. It is a problem if the only time we have to sit as a body and discuss issues is minutes prior to voting. We are charged with making incredibly important decisions that will have lasting effects on ratepayers and the industry. I believe we should have more time to discuss items well in advance of a vote. Otherwise I question our ability to make informed decisions and implement good public policy.

As such, I renew my request to meet before voting on items at Open Meeting to thoroughly discuss all amendments and even the items themselves if my colleagues are so willing. I am told that some previous Commissions used this practice. On the first day of Open Meeting, Commissioners would meet to discuss each agenda item. After the discussion on the first day, Commissioners had time to think about each matter and to draft or revise their amendments based on their discussions with their fellow Commissioners. On the second day of Open Meeting, the Commissioners would vote on the items, which I am told went quickly given that the issues had been fleshed out during the previous day's discussions. In my 20+ years of experience in public service, I have found that more opportunities for discussion with my colleagues lead to better public policy making. I care deeply about making the right decisions on the complex and difficult issues that come before us and I implore my colleagues to consider options that would allow for a more robust dialogue. Thus, for the aforementioned reasons, I have elected to file this concurring opinion to the decision.

Sincerely,



Robert L. Burns
Commissioner