

ARIZONA TRIBAL ENERGY ASSOCIATION

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June 15, 2018

RE: JPA Process Comments of the Arizona Tribal Energy Association

The Arizona Tribal Energy Association (ATEA) provides the following comments on the JPA process as of this stage of customer discussions. While the customer dialogue continues to evolve weekly, ATEA members consider it timely to offer these comments with respect to the overall process as well as voting, specifically. ATEA submits these comments on behalf of its current members, the electric utility enterprises of the Gila River, Tohono O'odham, Ak-Chin and Fort Mojave tribes.

ATEA looks forward to continued dialogue on this issue with Western DSW and customers.

1. ATEA comments here, as it has stated previously, that it has concerns regarding the degree of involvement the JPA process will create across DSW customers. ATEA supports the JPA or any similar effort as that time spent has merit and can generate overall customer benefits but not if it only or overwhelmingly creates additional engagement expense. The degree of customer involvement proposed currently appears to ATEA members to be excessive and to create added costs. It further seems that smaller customers may bear a disproportionate financial burden of that activity and ATEA believes that Western should seek to mitigate such an effect. ATEA does not consider absentee involvement (through written exchanges) to be an actual mitigation option, as that form of participation does not substitute for direct dialogue involvement.
2. ATEA also again stresses that this process must address non-signatory interests. ATEA does not consider DSW to have authority to delineate signatory interests as any priority over non-signing customers. Several issues exist in this regard, specifically with voting, as any vote that migrates an impact to an all-customer rate (or any other all-customer category) must include the consideration of all customers, not just a set (as signatories to a specific agreement or otherwise). This issue remains unaddressed as the JPA process is advancing.

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3. ATEA is concerned that as increased customer direction occurs, the risk of liability shifts from Western to customer interests may also arise. ATEA requests that this question be added to the JPA discussion process and addressed by Western.
4. Finally, ATEA urges the JPA customer group and DSW to be mindful of maintaining an appropriate balance between the level of involvement/detail and the process goals/objectives. ATEA does not support the premise that only unfettered involvement will produce the desired transparency assurances. The draft materials provided by the customer group seem to be migrating toward involvement to all identifiable degrees, which ATEA does not favor as, again, such involvement will not create the targeted cost/benefit outcome.