BEFORE THE ARIZONA CORPORATION COMMISSION

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

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF NET METERING COST SHIFT SOLUTION.

Docket No. E-01345A-13-0248

INITIAL BRIEF OF WESTERN RESOURCE ADVOCATES

Pursuant to the Procedural Order issued on April 28, 2014 in this docket, Western Resource Advocates ("WRA") states that it takes no position on the issue of whether any portion of APS' April 2, 2015 filing must be considered in a rate case. However, for all of the reasons stated in WRA's Response filed on April 21, 2015, WRA continues to believe that the issues raised in APS' filing are best considered in a full rate case.
RESPECTFULLY SUBMITTED this 22\textsuperscript{nd} day of May, 2015.

ARIZONA CENTER FOR LAW IN
THE PUBLIC INTEREST

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ORIGINAL and 13 COPIES of
the foregoing filed this 22\textsuperscript{nd} day
of May, 2015, with:

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

COPIES of the foregoing
electronically mailed this
22\textsuperscript{nd} day of May, 2015, to:

All Parties of Record