While not adopting or endorsing, nor rejecting, all of the commentary contained therein, Intervenor-Applicants Local Unions 387 and 769 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 387" and "IBEW Local 769") (collectively, "the IBEW Locals"), hereby notify the Commission that they fully support the relief sought by Arizona Public Service Company in its Motion to Amend Interlocutory Order dated September 25, 2015 (p. 4), to wit, "this proceeding would transition into a hearing with the goal of establishing important policy findings that guide subsequent APS proceedings before the Commission."
And, on a different note, the IBEW Locals would like to point out that an additional, and very important, reason for the Commission to grant their pending Motion to Intervene dated September 4, 2015 is that they, and all other labor organizations who may later appear before this Commission in this or any other case, may be potentially, and uniquely impacted by how the Commission resolves the issues and concerns raised by Intervenors Sunrun, Inc., et al. in their dual disqualification motions dated September 17, 2015. See Citizens United v. FEC, 558 U.S. 310, 372-373 (2010) (Roberts, C.J., concurring) (rejecting “a theory of the First Amendment that would allow censorship not only of television and radio broadcasts, but of pamphlets, posters, the Internet, and virtually any other medium that corporations and unions might find useful in expressing their views on matters of public concern.”) (emphasis added).

RESPECTFULLY SUBMITTED this 2nd day of October, 2015.

LUBIN & Enoch, P.C.  

[Signature]  
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Attorney for Intervenor-Applicants IBEW Locals 387 & 769

Original and thirteen (13) copies of IBEW Locals’ Comments filed this 2nd day of October, 2015, with: 

Arizona Corporation Commission 
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Copies of the foregoing transmitted electronically or mailed* this same date to those identified on the attached service list for this docket.

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