

**BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION**

IN THE MATTER OF FORMULA RATE)	
PLAN FILINGS OF ENTERGY ARKANSAS,)	DOCKET NO. 16-036-FR
INC., PURSUANT TO APSC DOCKET NO.)	
15-015-U)	

PETITION TO INTERVENE
BY ARKANSAS ELECTRIC ENERGY CONSUMERS, INC.

Arkansas Electric Energy Consumers, Inc. (hereinafter “AEEC”), by and through its attorney, Jordan Tinsley of Tinsley & Youngdahl, PLLC, hereby petitions the Arkansas Public Service Commission (hereinafter “APSC”) for leave to intervene in the above-captioned regulatory proceeding pursuant to Rule 4.02 of the APSC’s Rules of Practice and Procedure. AEEC states the following in support of its Petition to Intervene:

1. APSC Rule of Practice and Procedure 4.02(a) states the following: “Any Person whose interest may be directly affected by Commission action and whose interest is not adequately represented by other Parties may petition the Commission for leave to intervene as a Party in any Docket.”

2. AEEC is a non-profit, incorporated trade association organized and existing under the laws of the State of Arkansas. AEEC’s members are large industrial and agricultural organizations operating in Arkansas that purchase electricity from Entergy Arkansas, Inc. (hereinafter “EAI”) under that utility’s currently effective rate schedules. Exhibit A to this Petition identifies the members of AEEC.

3. EAI’s filings in this proceeding, and the APSC’s rulings thereon, will directly impact the cost, terms, and/or conditions of the electric utility service that EAI provides to AEEC’s members. Therefore, AEEC has an interest that will be directly affected by the APSC’s action in this docket.

4. The APSC has allowed AEEC to intervene and advocate on behalf of its members in numerous proceedings before it, including Docket No. 15-015-U, which was EAI's last general rate case. AEEC has also intervened in numerous other regulatory proceedings related to EAI and its rates.

5. No other party to this proceeding will adequately represent the interests of AEEC and its members. At this time, AEEC expects EAI, the APSC General Staff, and the Attorney General's office (hereinafter "the AG") to participate in this proceeding. Each of these parties has interests that differ significantly from the interests of AEEC and its members. At this time, AEEC expects EAI to seek an increase in its rates and charges pursuant to the formula rate mechanism approved in APSC Docket No. 15-015-U. None of the existing parties exclusively support the interests of large electricity users with regard to the issues raised by the rate increase sought by EAI. In fact, these parties have historically taken positions adverse to the interests of large electricity users such as AEEC's members. Therefore, no other party to this proceeding will adequately represent the interests of AEEC and its members.

6. Since AEEC has an interest that will be directly affected by the APSC's action in this docket and no other party to this proceeding will adequately represent the interests of AEEC and its members, AEEC meets the requirements for intervention established by Rule 4.02(a).

7. AEEC cannot articulate specific objections to EAI's filing at this time, insofar as AEEC continues to review the application, direct testimony, and exhibits filed by EAI in the above-captioned docket, although, if the APSC allows it to intervene, AEEC intends to advocate the interests of its members with regard to issues to be identified in the course of this docket.

8. This Petition is timely filed pursuant to the requirements outlined in the formula rate mechanism protocols approved by the APSC in APSC Docket No. 15-015-U.

9. Should the Commission grant this Petition to Intervene, AEEC respectfully requests that the Commission add the following persons to the official service list for this Docket:

Steve Cousins
Executive Director
Arkansas Electric Energy Consumers, Inc.
P.O. Box 368
Little Rock, AR 72203
Office: (501) 503-2256
Fax: (501) 374-2098
Mobile: (870) 310-4262
E-mail: stevecousins@agc-aeec.org

Jordan B. Tinsley
Tinsley & Youngdahl, PLLC
300 South Spring Street, Suite 614
Little Rock, AR 72201
Office: (501) 374-2099
Fax: (501) 374-2098
E-mail: jordan@TYattorney.com

WHEREFORE, Arkansas Electric Energy Consumers, Inc. hereby requests that the Arkansas Public Service Commission grant this Petition to Intervene, allow it to intervene and advocate on behalf of its members in this docket, and for any and all other relief to which the foregoing entitles it, or which justice and equity may require.

Respectfully submitted,

/s/ Jordan B. Tinsley
Jordan B. Tinsley ABN 2008270

Tinsley & Youngdahl, PLLC
300 South Spring Street, Suite 614
Little Rock, AR 72201
Office: (501) 374-2099
Fax: (501) 374-2098
E-mail: jordan@TYattorney.com

ATTORNEY FOR AEEC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been delivered on all parties of record by electronic mail via the APSC's Electronic Filing System this 26th day of July, 2016.

/s/ Jordan B. Tinsley
Jordan B. Tinsley ABN 2008270

EXHIBIT A

1. Arkansas Steel Associates
2. Chemtura Corporation
3. Clearwater Paper Company
4. Commercial Metals Companies
5. Deltic Timber
6. Georgia-Pacific LLC
7. Gerdau MacSteel
8. Lion Oil Company
9. Martin Operating Partnership, LP
10. Riceland Foods, Inc.
11. Tyson Foods, Inc.
12. Weyerhaeuser NR Company