Pinnacle West Capital Corporation

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
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Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:
☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:
☑ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:
☑ Publicly traded organization

(1.3.3) Description of organization

Pinnacle West Capital Corporation ("the Company"), an energy holding company based in Phoenix, has consolidated assets of over $29 billion, about 6,500 megawatts of generating capacity and approximately 6,400 employees in Arizona and New Mexico. Through its principal subsidiary, Arizona Public Service Company ("APS"), the Company provides retail electricity service to approximately 1.4 million Arizona homes and businesses. This report contains forward-looking statements based on current expectations. These forward-looking statements are often identified by words such as "estimate," "predict," "may," "believe," "plan," "expect," "require," "intend," "assume," "project," "anticipate," "goal," "seek," "strategy," "likely," "should," "will," "could," and similar words. Because actual results may differ materially from expectations, we caution readers not to place undue reliance on these statements. A number of factors could cause future results to differ materially from historical results, or from outcomes currently expected or sought by Pinnacle West or APS. A discussion of some of these risks and uncertainties is contained in the Pinnacle West/APS Annual Report on Form 10-K for the fiscal year ended December 31, 2024; the Form 10-Qs for the quarters ended March 31, 2025, and June 30, 2025; and on our website, at PinnacleWest.com, which readers should review carefully before placing any reliance on disclosures set forth in this report. We assume no obligation to update any forward-looking statements, even if our internal estimates change, except as may be required by applicable law.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/31/2024	*Select from:* ☑ Yes	*Select from:* ☑ No

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

5125000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

	Does your organization use this unique identifier?	Provide your unique identifier
ISIN code - bond	*Select from:* ☑ Yes	*US723484AL56, US72384AM30, US723484AN13*
ISIN code - equity	*Select from:* ☑ Yes	*US7234841010*
CUSIP number	*Select from:* ☑ Yes	*723484101*
Ticker symbol	*Select from:* ☑ Yes	*PNW*
SEDOL code	*Select from:* ☑ No	*Rich text input [must be under 50 characters]*
LEI number	*Select from:* ☑ Yes	*TWSEY0NEDUDCKS27AH81*

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☑ United States of America

(1.8) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?	Comment
	Select from: ☑ Yes, for all facilities	*See information in 1.8.1*

[Fixed row]

(1.8.1) Please provide all available geolocation data for your facilities.

Row 1

(1.8.1.1) Identifier

Palo Verde Generating Station

(1.8.1.2) Latitude

33.39528

(1.8.1.3) Longitude

-112.858333

(1.8.1.4) Comment

Nuclear power generation

Row 2

(1.8.1.1) Identifier

Redhawk Power Plant

(1.8.1.2) Latitude

33.33623

(1.8.1.3) Longitude

-112.840533

(1.8.1.4) Comment

Natural gas generation

Row 3

(1.8.1.1) Identifier

West Phoenix Power Plant

(1.8.1.2) Latitude

33.44028

(1.8.1.3) Longitude

-112.162777

(1.8.1.4) Comment

Natural gas generation

Row 4

(1.8.1.1) Identifier

Ocotillo Power Plant

(1.8.1.2) Latitude

33.42889

(1.8.1.3) Longitude

-111.910277

(1.8.1.4) Comment

Natural gas generation

Row 5

(1.8.1.1) Identifier

Sundance Power Plant

(1.8.1.2) Latitude

32.92794

(1.8.1.3) Longitude

-111.588993

(1.8.1.4) Comment

Natural gas generation

Row 6

(1.8.1.1) Identifier

Saguaro Power Plant

(1.8.1.2) Latitude

32.5539

(1.8.1.3) Longitude

-111.299829

(1.8.1.4) Comment

Natural gas generation

Row 7

(1.8.1.1) Identifier

Cholla Power Plant

(1.8.1.2) Latitude

34.94065

(1.8.1.3) Longitude

-110.299623

(1.8.1.4) Comment

Coal generation

Row 8

(1.8.1.1) Identifier

Four Corners Power Plant

(1.8.1.2) Latitude

36.68501

(1.8.1.3) Longitude

-108.479176

(1.8.1.4) Comment

Coal generation
[Add row]

(1.16) In which part of the electric utilities value chain does your organization operate?

Electric utilities value chain
☑ Distribution
☑ Electricity generation
☑ Electricity purchasing
☑ Transmission

Other divisions
☑ Battery storage
☑ Microgrids
☑ Smart grids/demand response

(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.

Coal - Hard

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

13507

(1.16.1.4) Net electricity generation (GWh)

7072

Lignite

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Oil

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

70

(1.16.1.4) Net electricity generation (GWh)

0.71

Gas

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

3558

(1.16.1.4) Net electricity generation (GWh)

8845

Sustainable biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Waste (non-biomass)

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Nuclear

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

1146

(1.16.1.4) Net electricity generation (GWh)

9511

Fossil-fuel plants fitted with carbon capture and storage

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Geothermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Hydropower

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Solar

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

416

(1.16.1.4) Net electricity generation (GWh)

1113

Marine

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other non-renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Total

(1.16.1.2) Nameplate capacity (MW)

6540

(1.16.1.4) Net electricity generation (GWh)

26542
[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Short-term horizons are used to plan for the upcoming fiscal year to track to short-term goals from each Business Unit. Emergent risks are often identified in short-term time horizons with ultimate longer-term implications.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Medium-term horizons are typically used for the business planning process and by the Integrated Resource Planning team.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:
☑ No

(2.1.3) To (years)

30

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Long-term horizons are used by the Integrated Resource Planning team, Enterprise Risk Management and Corporate Strategy to ensure the business is planning for and assessing future risks and opportunities, and to support a sustainable future for Arizona.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Not location specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management
☑ Enterprise Risk Management
☑ Internal company methods
☑ Other enterprise risk management, please specify :Internal system based on ISO 31000 and COSO principles

International methodologies and standards
☑ Other international methodologies and standards, please specify :Internal system based on ISO 14001 principles

Other
☑ External consultants

(2.2.2.13) Risk types and criteria considered

Acute physical
☑ Drought
☑ Heat waves
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Storm (including blizzards, dust, and sandstorms)
☑ Wildfires

Chronic physical
☑ Heat stress
☑ Precipitation or hydrological variability
☑ Temperature variability
☑ Water availability at a basin/catchment level
☑ Water stress

Policy
☑ Changes to national legislation

Market

☑ Availability and/or increased cost of raw materials

☑ Changing customer behavior

☑ Uncertainty in the market signals

Reputation

☑ Impact on human health

☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

Technology

☑ Transition to lower emissions technology and products

Liability

☑ Exposure to litigation

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

RESPONSIBILITIES Responsibility for managing the Company's risks rests with the Company's senior management team. The Board's oversight of the Company's risk management function is designed to provide assurance that our risk management processes are well adapted to, and consistent with, the Company's business and strategy, and are functioning as intended. BOARD OF DIRECTORS The Board focuses on fostering a culture of risk awareness and risk-adjusted decision-making and ensuring that an appropriate "tone at the top" is established. The Board annually discusses and updates a listing of areas of risk and a suggested allocation of responsibilities for such risks among the Board and the Board committees. The Board reviews those risks throughout the year. COMMITTEES The charter for each of the Board's committees requires each committee to periodically review risks in its respective area. Each committee: • receives periodic presentations or reports from management about its assigned risk areas • receives information about the effectiveness of the risk identification and mitigation measures being employed • discusses its risk reviews with the Board The Audit Committee periodically reviews the Company's risk assessment processes, guidelines, policies, and programs, as well as the Company's major financial risk exposures and the steps management has taken to monitor and control such exposures. ENTERPRISE RISK MANAGEMENT GROUP – EXECUTIVE RISK COMMITTEE • The Enterprise Risk Management group reports to the Company's Vice President, Controller and Chief Accounting Officer. The internal group is responsible for implementing a consistent risk management framework and the Risk Oversight and Governance process to raise and report material Company risks to the Executive Risk Committee ("ERC") and the Board of Directors • The ERC is

comprised primarily of senior-level officers of the Company and is chaired by the Company's Senior Vice President and Chief Financial Officer. The ERC is responsible for ensuring that the Board receives timely information concerning the Company's material risks and risk management processes and the effectiveness of the Enterprise Risk Management program.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Not location specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Enterprise Risk Management

☑ Internal company methods

☑ Other enterprise risk management, please specify :Internal system based on ISO 31000 and COSO principles

International methodologies and standards

☑ Other international methodologies and standards, please specify :Internal system based on ISO 14001 principles

Other

☑ External consultants

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Storm (including blizzards, dust, and sandstorms)

☑ Wildfires

Chronic physical

☑ Water stress

☑ Groundwater depletion

☑ Temperature variability

☑ Water quality at a basin/catchment level

☑ Precipitation or hydrological variability

☑ Increased severity of extreme weather events

☑ Water availability at a basin/catchment level

Policy

☑ Changes to national legislation

☑ Increased pricing of water

☑ Regulation of discharge quality/volumes

☑ Statutory water withdrawal limits/changes to water allocation

Market

☑ Availability and/or increased cost of raw materials

☑ Changing customer behavior

☑ Uncertainty in the market signals

Reputation

☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

☑ Stakeholder conflicts concerning water resources at a basin/catchment level

Technology

☑ Transition to water efficient and low water intensity technologies and products

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

RESPONSIBILITIES Responsibility for managing the Company's risks rests with the Company's senior management team. The Board's oversight of the Company's risk management function is designed to provide assurance that our risk management processes are well adapted to, and consistent with, the Company's business and strategy, and are functioning as intended. BOARD OF DIRECTORS The Board focuses on fostering a culture of risk awareness and risk-adjusted decision-making and ensuring that an appropriate "tone at the top" is established. The Board annually discusses and updates a listing of areas of risk and a suggested allocation of responsibilities for such risks among the Board and the Board committees. The Board reviews those risks throughout the year. COMMITTEES The charter for each of the Board's committees requires each committee to periodically review risks in its respective area. Each committee: • receives periodic presentations or reports from management about its assigned risk areas • receives information about the effectiveness of the risk identification and mitigation measures being employed • discusses its risk reviews with the Board The Audit Committee periodically reviews the Company's risk assessment processes, guidelines, policies, and programs, as well as the Company's major financial risk exposures and the steps management has taken to monitor and control such exposures. ENTERPRISE RISK MANAGEMENT GROUP – EXECUTIVE RISK COMMITTEE • The Enterprise Risk Management group reports to the Company's Vice President, Controller and Chief Accounting Officer. The internal group is responsible for implementing a consistent risk management framework and the Risk Oversight and Governance process to raise and report material Company risks to the Executive Risk Committee ("ERC") and the Board of Directors • The ERC is comprised primarily of senior-level officers of the Company and is chaired by the Company's Senior Vice President and Chief Financial Officer. The ERC is responsible for ensuring that the Board receives timely information concerning the Company's material risks and risk management processes and the effectiveness of the Enterprise Risk Management program.

[Add row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.7) Application of definition

APS defines substantive or strategic impact to the business based on whether an observed or anticipated effect is large enough to be meaningful within the context of financial, operational, reputational or safety impacts. The Enterprise Risk Management framework is a depiction of how the Company to identifies, assesses, mitigates and controls risks. For financial impact, the thresholds are described as follows: (04) - Major means an impact of greater than $25M; (03) - Significant means an impact between $15M and $25M; (02) - Moderate means an impact between $5M and $15M; (01) - Limited means an impact between $2M and $5M; (00) -

Very limited means an impact between $0 and $2M. For operational impact, the thresholds are described as follows: (04) - Major means potential for grid instability leading to large-scale blackouts due to generation or transmission related voltage and frequency instabilities; (03) - Significant means potential for rolling blackouts at times when the demand exceeds supply (large geographical area effects) or an event which has a reasonable probability of significantly negatively impacting the Company's operational objectives; (02) - Moderate means outages arising from a major line or circuit outage impacting greater than 50,000 customers or an event which has a reasonable probability of moderate negative impact to the Company's operational objective; (01) - Limited means local outages caused by pole collapse, pole fires or transformer problems usually impacting a smaller geographical area or an event which has a reasonable probability of limited negative impact to the Company's operational objective. (00) - Very limited means no outages or local outages of a very small duration.
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:
☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

APS has multiple environmental compliance programs that protect water ecosystems and human health from potential water pollutants associated with our business activities. Examples include our National Pollutant Discharge Elimination System (NPDES), Spill Prevention Control, and Countermeasure (SPCC), and Arizona Aquifer Protection Permit compliance programs. NPDES compliance efforts identify and classify potential water pollutants in permitted discharges from our facilities into regulated waterways through internal monitoring of existing pollutants and ensuring that all treatment system discharges comply with permit limits, Pretreatment Local Limits, and/or Surface Water Quality Standards, as applicable. We adhere to Clean Water Act requirements to identify and treat (if present in discharge) conventional pollutants such as BOD, TSS, pH, oil and grease, 65 Priority Pollutants, and 126 Priority Toxic Pollutants.
[Fixed row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental risks identified
Climate change	*Select from:* ☑ Yes, only within our direct operations
Water	*Select from:* ☑ Yes, only within our direct operations

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:
☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical
☑ Wildfires

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Wildfires have the potential to affect communities within APS's service territory and the surrounding areas, as well as APS's vast network of electric transmission and distribution lines and facilities. The potential likelihood and severity of wildfires has increased due to many of the same weather and climate change impacts existing in Arizona as those that led to catastrophic wildfires in other states. The continued expansion of the wildland urban interface has also increased wildfire risk to surrounding communities. Extreme weather events such as severe storms and strong wind gusts may also increase the likelihood of a wildfire in our service territory. APS has a Comprehensive Wildfire Mitigation Plan ("CWMP") that employs various strategies designed to prevent, mitigate, and respond to wildfire risks. APS's CWMP includes vegetation management and clearing protocols, operational measures and a public safety power shut off program ("PSPS") on certain feeders, among other practices. However, APS's fire mitigation efforts may be insufficient to prevent wildfires in APS's expansive service territory and surrounding areas and could result in claims alleging damages due to the use, non-use, timing, or effectiveness of such measures. In addition, APS could be sued regardless of fault for damages incurred as a result of wildfires and may not be able to recover all or a substantial portion of any such damages or costs from insurance or through rates.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ High

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Groundwater depletion

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :AMAs, Colorado River, San Juan River Basin

(3.1.1.9) Organization-specific description of risk

Assured supplies of water are important for APS's generating plants. Water in the southwestern United States is limited, and various parties have made conflicting claims regarding the right to access and use such limited supplies of water. Both groundwater and surface water in areas important to the operation of APS's generating plants have been and are the subject of inquiries, claims and legal proceedings. In addition, the region in which APS's power plants are located suffers from prolonged drought conditions, which could potentially affect the plants' water supplies. Climate change is also projected to exacerbate such drought conditions. In addition, Colorado River water supplies for Arizona are subject to a Tier 1 shortage declaration, which substantially limits the quantity of water available for the state. APS's inability to access sufficient supplies of water, along with that of its customers, could have a material adverse impact on our business and results of operations.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify :Phoenix Active Management Area

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

4

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 26-50%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ 71-80%

(3.2.11) Please explain

Includes Palo Verde Generating Station, Redhawk Power Plant, West Phoenix Power Plant, and Ocotillo Power Plant

Row 2

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify :Pinal Active Management Area

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ Less than 1%

(3.2.11) Please explain

Sundance Power Plant

Row 3

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify :Tucson Active Management Area

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ Less than 1%

(3.2.11) Please explain

Saguaro Power Plant

Row 4

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify :Joseph City Irrigation Non-expansion Area

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:
☑ 1-25%

(3.2.10) % organization’s total global revenue that could be affected

Select from:
☑ 1-10%

(3.2.11) Please explain

Cholla Power Plant

Row 5

(3.2.1) Country/Area & River basin

United States of America
☑ Other, please specify :San Juan River Basin

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply
☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 11-20%

(3.2.11) Please explain

Four Corners Power Plant

Row 6

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify :Colorado River Basin

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ Less than 1%

(3.2.11) Please explain

Yucca Power Plant
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Comment
	Select from: ☑ No	*No fines or significant enforcement actions received*

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☑ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply

☑ California CaT - ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

California CaT - ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

2.39

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

199000

(3.5.2.6) Allowances purchased

205000

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

261768.68

(3.5.2.9) Details of ownership

Select from:

☑ Facilities we own and operate

[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Since 2012, we have had policies and procedures in place to track and monitor our obligations and allowances, related to the net imports into the state of California, to comply with California's AB-32 cap-and-trade program. The Risk Management group compares obligations and allowances weekly in accordance with our internal GHG Hedge Policy to ensure APS is able to fulfil our Compliance Requirements of the GHG Allowance Process. Additionally, our Back Office Settlements team tracks allowances using the Compliance Instrument Tracking System Service (CITSS) system monthly to validate APS emissions transactions are accurately and completely captured, inventoried, and settled ensuring compliance with the requirements of the Western Climate Initiative cap-and-trade Programs. CITSS tracks compliance instruments (emissions allowances and offsets) from the point of issuance by jurisdictional governments, to ownership, transfer by regulated greenhouse gas emitters and other voluntary or general market participants, and to final compliance retirement. This strategy has kept us in compliance with our participation in the California cap-and-trade program. Timescale of implementation for this strategy is immediate and will continue as long as we are participating in the California market.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized
Water	*Select from:* ☑ No

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Other energy source opportunity, please specify :Supportive policy incentives

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

The energy efficiency standard (EES) set by the Arizona Corporation Commission, required utilities to achieve cumulative savings equivalent to 22% of 2020 retail sales. In 2021, APS reached compliance with the 22% cumulative savings goal. In the 2022 Demand Side Management (DSM) Plan, the ACC established a goal for APS to achieve annual incremental savings of 405,002 MWh from approved DSM programs in 2022. APS was able to deliver over 87% of this annual savings goal by achieving savings of 354,153 MWh. In 2023, APS exceeded the 2022 approved DSM savings goal by achieving 408,644 MWh of savings. That is enough energy to power more than 29,700 typical Arizona households for an entire year. In 2024, APS achieved 425,092 MWh of savings. Since 2005, the lifetime energy savings from our energy efficiency programs have avoided approximately 30 million metric tons of carbon emissions. There is a cost to implement DSM programs, but ultimately the savings from DSM potentially reduce our indirect (operating) costs by helping to reduce demand on our fleet. APS offers a comprehensive portfolio of DSM programs to achieve the required EES. The APS DSM portfolio also includes a focus on demand response, load shifting, energy storage and load management programs designed to help flatten system load shapes and shift energy use into the middle of the day during peak solar production when APS's generation mix has the lowest carbon intensity.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Each year APS files a Demand Side Management (DSM) implementation plan with the Arizona Corporation Commission (ACC) that includes detailed information about DSM program goals, estimated participation, energy savings, emissions reductions and proposed budgets. Since program inception, this investment has created almost $1.4 billion of net benefits (present value of societal benefits created by avoiding energy generation less the present value of societal costs from installing energy efficient measures) for APS customers. The APS DSM portfolio is measured for cost effectiveness using the Societal Cost Test. These net benefits are the result of avoided generation capacity, fuel savings and operations and maintenance savings due to APS DSM programs. These net benefits do not include any monetary value for the carbon emission savings resulting from programs – these savings are quantified but not monetized. Based on portfolio cost effectiveness results reported to the Arizona Corporation Commission, the APS DSM portfolio has produced over $1.43 billion in net benefits (total benefits minus costs) for APS customers from 2005-2024. Of the $1.43 billion, $542.7 million in benefits result from implemented residential energy efficiency programs, $932.3 million is in benefits result from implemented business energy efficiency programs. Energy efficiency measures implemented by our customers in 2024, totaling 418,642 MWh annual savings, contributed $106.8 million net benefits to the over $1.43 billion in net benefits from 2005-2024.

(3.6.1.26) Strategy to realize opportunity

During the time period from 2005 through 2024, APS spent a total of over $947.76 million in customer-focused demand side management (DSM) programs and expenses. This investment has created over $1.43 billion of net economic benefits (present value of societal benefits created by avoiding energy generation less the

present value of societal costs from installing energy efficient measures) for APS customers. Of the $947.76 million in program to date expenses, $385.4 million was for the implementation of residential energy efficiency program, $342.2 million for the implementation of non-residential programs, $81.7 million for other initiatives including Demand Response, Energy Storage and Load Management programs, Managed EV Charging Pilot, Energy and Demand Education, tribal communities and codes and standards, $39.7 million for measurement, evaluation, and research, and $67.6 million for performance incentives. Each year APS files an annual DSM implementation plan with the Arizona Corporation Commission for approval that includes detailed information about DSM program goals, estimated participation, energy savings, emissions reductions and proposed budgets.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

APS operates a Virtual Power Plant (VPP) in partnership with customers, a network of thousands of customer-owned devices, like smart thermostats and home battery storage, that act as an energy resource and a collaborative way to reduce energy demand at peak times to balance supply and demand. The energy production this connection of smart technology avoids reduces the need to start up or build a traditional, physical power plant. This saves customers' money, protects the environment and increases overall grid reliability.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Independent non-executive directors or equivalent

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes

	Board-level oversight of this environmental issue
Water	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board chair

☑ Chief Executive Officer (CEO)

☑ Board-level committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Sporadic – agenda item as important matters arise

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Monitoring the implementation of the business strategy

(4.1.2.7) Please explain

The Nuclear and Operating Committee receive and discuss regular reports from management concerning the safety and environmental policies and practices of the Company, and monitor compliance by the Company with such policies and applicable laws and regulations. In addition, the Board's Corporate Governance and Nominating Committee review significant sustainability trends that may impact the Company, ensure the oversight of relevant sustainability issues by the Board and its committees, and make recommendations to the Board as appropriate. The Committee will have direct oversight of climate change related issues and the Company's strategies in response to those issues.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board chair

☑ Chief Executive Officer (CEO)

☑ Board-level committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Sporadic – agenda item as important matters arise

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Monitoring the implementation of the business strategy

(4.1.2.7) Please explain

The Nuclear and Operating Committee receive and discuss regular reports from management concerning the safety and environmental policies and practices of the Company, and monitor compliance by the Company with such policies and applicable laws and regulations. In addition, the Board's Corporate Governance and Nominating Committee review significant sustainability trends that may impact the Company, ensure the oversight of relevant sustainability issues by the Board and its committees, and make recommendations to the Board as appropriate.
[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ As important matters arise

(4.3.1.6) Please explain

The Chief Executive Officer (CEO), who is also the Chairman of the Board and President of Pinnacle West as well as the Chairman of the Board, President and CEO of Arizona Public Service Company, provides the vision and leadership to execute the Company's strategy and create shareholder value. Additionally, the CEO has overarching responsibility for managing risk, including climate change and greenhouse gas risks that directly or indirectly impact our ability to execute to our mission and achieve our vision. The CEO and other Officers participate in a twice-monthly forum. The executives review, evaluate, assess, discuss and determine strategy on energy-related issues, including climate-related issues, risks and opportunities, and establish policies that support our long-term corporate strategy. The CEO is responsible for leading the forum and is responsible for climate-related decisions and the implementation of strategies, policies and initiatives on climate-related issues.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ As important matters arise

(4.3.1.6) Please explain

The Chief Executive Officer (CEO), who is also the Chairman of the Board and President of Pinnacle West as well as the Chairman of the Board, President, and CEO of Arizona Public Service Company, provides the vision and leadership to execute the Company's strategy and create shareholder value. Additionally, the CEO has overarching responsibility for managing risk, including water risks that directly or indirectly impact our ability to execute to our mission and achieve our vision. The CEO and other Officers participate in a twice-monthly forum. The executives review, evaluate, assess, discuss and determine strategy on energy-related issues, including water-related issues, risks and opportunities, and establish policies that support our long-term corporate strategy. The CEO is responsible for leading the forum and is responsible for water-related decisions and the implementation of strategies, policies and initiatives on water-related issues.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.3) Please explain

Our compensation programs focus on transparency with an emphasis on incentivizing performance and compensation philosophy incorporates multiple business performance metrics. One example is the Palo Verde Generation Station's (PVGS) capacity factor. PVGS is critical to the Company's ability to achieve its carbon neutral aspirations and mitigate the effects of climate change. In 2024, PVGS's capacity factor target was 99%, and the plant reached an actual capacity factor of 100.49%. A Clean MW Installed metric is tied to the Company's NEOs long-term executive compensation and establishes targets and measures performance related to the installation of clean, renewable, or other carbon-free resources over a rolling three-year average, commencing in 2022.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.3) Please explain

Our compensation programs focus on transparency with an emphasis on incentivizing performance and compensation philosophy incorporates multiple business performance metrics.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.5) Further details of incentives

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Corporate executive team

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Long-Term Incentive Plan, or equivalent, only (e.g. contractual multi-year bonus)

(4.5.1.5) Further details of incentives

Our compensation programs focus on transparency with an emphasis on incentivizing performance and compensation philosophy incorporates multiple business performance metrics. One example is the Palo Verde Generation Station's (PVGS) capacity factor. PVGS is critical to the Company's ability to achieve its carbon neutral aspirations. and mitigate the effects of climate change. In 2024, PVGS's capacity factor target was 99%, and the plant reached an actual capacity factor of 100.49%.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Facility/Unit/Site management

☑ Business unit manager

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

Eligible managers and employees receive annual cash incentives based on the achievement of specified performance goals, with a focus on transparency and an emphasis on incentivizing performance. APS's compensation philosophy incorporates multiple business performance metrics to make progress towards environmental targets.

Water

(4.5.1.1) Position entitled to monetary incentive

Facility/Unit/Site management

☑ Business unit manager

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

Eligible managers and employees receive annual cash incentives based on the achievement of specified performance goals, with a focus on transparency and an emphasis on incentivizing performance. APS's compensation philosophy incorporates multiple business performance metrics to make progress towards environmental targets.
[Add row]

C5. Business strategy

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:

☑ Yes

(5.5.2) Comment

APS deploys a number of advanced technologies on its system, including energy storage. Energy storage provides capacity, improves power quality, can be utilized for system regulation and, in certain circumstances, be used to defer certain traditional infrastructure investments. Energy storage also aids in integrating renewable generation by storing excess energy when system demand is low and renewable production is high and then releasing stored energy during peak demand hours later in the day after sunset. APS is utilizing grid-scale energy projects to meet reliability requirements, increase renewable utilization, and to further our understanding of how storage works with other advanced technologies and the grid. Current new capacity of energy storage in operation at the end of 2024 was 668MW (including APS owned energy storage, PPAs Energy Storage and Custome-Sited Storage) and net capacity planned or under development was 5,288 MW. Agreements for the development and completion of future resources are subject to various conditions.
[Fixed row]

(5.7) Break down, by source, your organization’s CAPEX in the reporting year and CAPEX planned over the next 5 years.

Nuclear

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

130000000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

23

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

17

(5.7.5) Explain your CAPEX calculations, including any assumptions

CAPEX in the reporting year is an estimated spend based on what was reported in the 2023 10K for estimated spend in 2024. CAPEX is being reported over the next 3 years (not 5) to align with our 10K reporting for 2024.

Other renewable (e.g. renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

145000000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

7

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

12

(5.7.5) Explain your CAPEX calculations, including any assumptions

CAPEX in the reporting year is an estimated spend based on what was reported in the 2023 10K for estimated spend in 2024. The category in the 10K is "Renewables and Energy Storage Systems", this includes APS Solar Communities program, energy storage, renewable projects and other clean energy projects. CAPEX is being reported over the next 3 years (not 5) to align with our 10K reporting for 2024.

Other non-renewable (e.g. non-renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

455000000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

23

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

17

(5.7.5) Explain your CAPEX calculations, including any assumptions

CAPEX in the reporting year is an estimated spend based on what was reported in the 2023 10K for estimated spend in 2024. This category in the 10K is "Other generation" and includes environmental projects. CAPEX is being reported over the next 3 years (not 5) to align with our 10K reporting for 2024.
[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: ☑ Yes	*Select all that apply* ☑ Carbon

[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:

☑ Internal fee

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☑ Navigate regulations

☑ Other, please specify :Integrated Resource Planning

(5.10.1.3) Factors considered when determining the price

Select all that apply

☑ Existing or pending legislation

(5.10.1.4) Calculation methodology and assumptions made in determining the price

APS has included the potential for carbon pricing in its 2023 Integrated Resource Plan (IRP). The CO2 cost included in the IRP analysis was based on the California market cap-and-trade 2020 CO2 cost of $25, escalated at 2.5% beginning in 2028. Prior to 2028, APS's analysis assumed the CO2 cost to be $0.

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

We use internal price on carbon to measure, model and manage financial and regulatory risks from emerging GHG regulations. For instance, APS has included the potential for carbon pricing in its 2023 Integrated Resource Plan (IRP). The CO2 cost included in the IRP analysis was based on the California market cap-and-trade 2020 CO2 cost of $25, escalated at 2.5% beginning in 2028. Prior to 2028, APS's analysis assumed the CO2 cost to be $0. These costs could result in higher revenue requirements recovered through a rate review or adjustor mechanisms. A carbon cost will continue to be integrated into future scenarios as we work with stakeholders on future resource plans.
[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used
Climate change	*Select from:* ☑ Financial control
Water	*Select from:* ☑ Operational control

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ The Climate Registry: Electric Power Sector (EPS) Protocol

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

☑ US EPA Mandatory Greenhouse Gas Reporting Rule

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	Select from: ☑ We are reporting a Scope 2, location-based figure	*Select from:* ☑ We are reporting a Scope 2, market-based figure	*We calculate both Location-Based and Market-Based emissions*

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 3: Capital goods

☑ Scope 3: Employee commuting

☑ Scope 3: Purchased goods and services

☑ Scope 3: Waste generated in operations

☑ Scope 3: Upstream transportation and distribution

☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

☑ Emissions are not evaluated

[Add row]

(7.5) Provide your base year and base year emissions.

	Base year end	Base year emissions (metric tons CO2e)	Methodological details
Scope 1	*12/31/2005*	*16661531.0*	*2005 is used as the Scope 1 baseline year to align our carbon emission reductions with the targets set at COP 21.*
Scope 2 (location-based)	*12/31/2020*	*116939.0*	*2020 is used as the baseline year for Scope 2 carbon emissions because this is the first year we updated our methodology.*
Scope 2 (market-based)	*12/31/2020*	*116939.0*	*2020 is used as the baseline year for Scope 2 carbon emissions because this is the first year we updated our methodology.*
Scope 3 category 6: Business travel	*12/30/2016*	*4153.0*	*Partial emissions calculated and included*

[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

	Gross global Scope 1 emissions (metric tons CO2e)
Reporting year	*10975406.28*

[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

	Gross global Scope 2, location-based emissions (metric tons CO2e)	Gross global Scope 2, market-based emissions (metric tons CO2e)
Reporting year	*176771.31*	*158087.4*

[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1686.34

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Supplier-specific method

☑ Spend-based method

☑ Distance-based method

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ Reasonable assurance

(7.9.1.4) Attach the statement

APS CY2024_Verification Opinion.pdf

(7.9.1.5) Page/section reference

Page 3

(7.9.1.6) Relevant standard

Select from:
☑ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Reasonable assurance

(7.9.2.5) Attach the statement

APS CY2024_Verification Opinion.pdf

(7.9.2.6) Page/ section reference

Page 3

(7.9.2.7) Relevant standard

Select from:

☑ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:
☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:
☑ Reasonable assurance

(7.9.2.5) Attach the statement

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(7.9.2.6) Page/ section reference

Page 3

(7.9.2.7) Relevant standard

Select from:

☑ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply
☑ Scope 3: Business travel

(7.9.3.2) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:
☑ Reasonable assurance

(7.9.3.5) Attach the statement

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(7.9.3.6) Page/section reference

Page 3

(7.9.3.7) Relevant standard

Select from:
☑ ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Increased

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:
☑ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

10892401.1

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ SF6

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

8828.73

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:
☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

25117.87

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 4

(7.15.1.1) Greenhouse gas

Select from:
☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

33704.31

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)
[Add row]

(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

Fugitives

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0.38

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

8829

(7.15.3.5) Comment

SF6 Fugitive Emissions

Combustion (Electric utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

10892401.1

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

897.1

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

10951223

(7.15.3.5) Comment

APS Generation

Combustion (Gas utilities)

(7.15.3.5) Comment

APS is not a gas utility

Combustion (Other)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

15270.86

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

15274.83

(7.15.3.5) Comment

Diesel and gasoline from mobile fleet and generators

Emissions not elsewhere classified

(7.15.3.5) Comment

No additional emissions to report
[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)
United States of America	*10975406.28*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

☑ By facility

☑ By activity

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	*Generation. All emissions based on owned energy production.*	*10951223.28*
Row 2	*Transmission and Distribution. All emissions based on fleet and mobile generators.*	*15354.28*

[Add row]

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

Four Corners Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

5615202

(7.17.2.3) Latitude

40.929011

(7.17.2.4) Longitude

-121.544389

Row 2

(7.17.2.1) Facility

Yucca Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

204335

(7.17.2.3) Latitude

32.715235

(7.17.2.4) Longitude

-114.710441

Row 3

(7.17.2.1) Facility

Sundance Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

211698

(7.17.2.3) Latitude

53.5075

(7.17.2.4) Longitude

-114.557222

Row 4

(7.17.2.1) Facility

Cholla Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1414441

(7.17.2.3) Latitude

34.94

(7.17.2.4) Longitude

-110.33

Row 5

(7.17.2.1) Facility

Ocotillo Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

273879

(7.17.2.3) Latitude

33.4225

(7.17.2.4) Longitude

-111.9122

Row 6

(7.17.2.1) Facility

West Phoenix Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1542356

(7.17.2.3) Latitude

33.773441

(7.17.2.4) Longitude

-84.394931

Row 7

(7.17.2.1) Facility

Douglas Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3

(7.17.2.3) Latitude

31.363622

(7.17.2.4) Longitude

-109.552532

Row 8

(7.17.2.1) Facility

Saguaro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

97338

(7.17.2.3) Latitude

32.552181

(7.17.2.4) Longitude

-111.298135

Row 9

(7.17.2.1) Facility

Redhawk Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1593476

(7.17.2.3) Latitude

33.335833

(7.17.2.4) Longitude

-112.840528
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Stationary Combustion*	*10951223*
Row 2	*Fugitive Combustion*	*8828.73*
Row 3	*Mobile Combustion*	*15354.28*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e
Electric utility activities	*10975406*

[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☑ No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☑ More than 70% but less than or equal to 75%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:*

	Indicate whether your organization undertook this energy-related activity in the reporting year
	☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

	Total (renewable + non-renewable) MWh
Consumption of self-generated non-fuel renewable energy	*0.00*

[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ No
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

	Heating value	Total fuel MWh consumed by the organization
Other renewable fuels (e.g. renewable hydrogen)	*Select from:* ☑ HHV	*1113245*
Coal	*Select from:* ☑ HHV	*7072184*

	Heating value	Total fuel MWh consumed by the organization
Oil	*Select from:* ☑ HHV	*4029*
Gas	*Select from:* ☑ HHV	*8845046*
Other non-renewable fuels (e.g. non-renewable hydrogen)	*Select from:* ☑ HHV	*9511134*
Total fuel	*Select from:* ☑ HHV	*26545639*

[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

	Consumption of self-generated electricity (MWh)
United States of America	*38832830*

[Fixed row]

(7.33) Does your electric utility organization have a transmission and distribution business?

Select from:

☑ Yes

(7.33.1) Disclose the following information about your transmission and distribution business.

Row 1

(7.33.1.1) Country/area/region

Select from:

☑ United States of America

(7.33.1.2) Voltage level

Select from:

☑ Distribution (low voltage)

(7.33.1.3) Annual load (GWh)

38833

(7.33.1.4) Annual energy losses (% of annual load)

1.5

(7.33.1.5) Scope where emissions from energy losses are accounted for

Select from:

☑ Scope 1

(7.33.1.6) Emissions from energy losses (metric tons CO2e)

242337.08

(7.33.1.7) Length of network (km)

66305

(7.33.1.8) Number of connections

1400094

(7.33.1.9) Area covered (km2)

88060

(7.33.1.10) Comment

APS owns transmission (above 69kV) and distribution lines. However, the majority of the lines are distribution so both types of lines are included in this response. The number of connections shown in the number of electric customers served at year end. Additionally, our line losses from purchased power are covered in our Scope 2 emissions. However, line losses for electricity we generate and distribute are accounted for at the point of generation, Scope 1. Since we cannot choose two scopes, for the purpose of this response, Scope 1 was chosen as the majority of the power we distribute is from power that we generate.
[Add row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.002

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

11133494.4

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

5125000000

(7.45.5) Scope 2 figure used

Select from:
☑ Market-based

(7.45.6) % change from previous year

5

(7.45.7) Direction of change

Select from:
☑ Decreased

(7.45.8) Reasons for change

Select all that apply
☑ Change in revenue

Row 2

(7.45.1) Intensity figure

0.291

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

11133494.4

(7.45.3) Metric denominator

Select from:
☑ megawatt hour transmitted (MWh)

(7.45.4) Metric denominator: Unit total

38256000

(7.45.5) Scope 2 figure used

Select from:
☑ Market-based

(7.45.6) % change from previous year

4

(7.45.7) Direction of change

Select from:
☑ Decreased

(7.45.8) Reasons for change

Select all that apply
☑ Change in output
[Add row]

(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.

	Absolute scope 1 emissions (metric tons CO2e)	Emissions intensity based on gross or net electricity generation	Scope 1 emissions intensity (Net generation)
Coal – hard	*7029643*	*Select from:* ☑ Gross	*994.01*
Oil	*4932*	*Select from:* ☑ Gross	*6946.48*
Gas	*3918154*	*Select from:* ☑ Gross	*442.98*
Nuclear	*0*	*Select from:* ☑ Gross	*0.00*
Solar	*0*	*Select from:* ☑ Gross	*0.00*
Total	*10952729*	*Select from:* ☑ Gross	*Auto calculated*

[Fixed row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Net-zero targets

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

08/01/2025

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.5) End date of target for achieving net zero

12/31/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ No, and we do not anticipate setting one in the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

(7.54.3.10) Explain target coverage and identify any exclusions

In August 2025, the Company updated its clean energy goals from "zero-carbon" to "carbon-neutral" by 2050, while also relying on the Integrated Resource Planning process to drive interim progress. As Arizona's population and economy continue to grow at unprecedented levels, so does the state's need for reliable electricity.

(7.54.3.17) Target status in reporting year

Select from:

☑ Revised

(7.54.3.18) Explain the reasons for the revision, retirement, or replacement of the target

As Arizona's population and economy continue to grow at unprecedented levels, so does the state's need for reliable electricity. "Our mission is to reliably serve customers at the lowest cost possible. To do that, we need to integrate the most reliable and cost-effective resources available to us to meet Arizona's fast-growing energy needs," said Geisler. As a result, the company is updating its clean energy goals from an aspirational "zero-carbon" approach to an aspirational "carbon-neutral" approach by 2050. The company also is removing its interim targets to better reflect APS's near-term need to ensure reliability and affordability, while relying on the Integrated Resource Planning (IRP) process to help determine the most responsible path forward.
[Add row]

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:
☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:
☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:
☑ No taxonomy used to classify product(s) or service(s) as low carbon

(7.74.1.3) Type of product(s) or service(s)

Power
☑ Solar PV

(7.74.1.4) Description of product(s) or service(s)

APS Green Choice program allows customers to purchase up to 100% of their power from renewable energy from Arizona and New Mexico. APS also offers a Green Power Program for businesses with three options for participation.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No

Row 2

(7.74.1.1) Level of aggregation

Select from:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify :Arizona Energy Efficiency Standard and all programs use ENERGY STAR products

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Other, please specify :Energy Efficiency programs for customers, residential and commercial

(7.74.1.4) Description of product(s) or service(s)

APS offers customers a comprehensive portfolio of energy efficiency options.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No
[Add row]

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:
☑ Yes

(9.1.1) Provide details on these exclusions.

Row 1

(9.1.1.1) Exclusion

Select from:
☑ Facilities

(9.1.1.2) Description of exclusion

Commercial office buildings and facilities not associated with power generation

(9.1.1.3) Reason for exclusion

Select from:
☑ Small volume [rainwater]

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:
☑ Less than 1%

(9.1.1.8) Please explain

The facilities are excluded because the amount of water used in office buildings is immaterial in comparison to the amount of water used in power generation, and the water is provided from sources that are not at risk of shortages. However, APS does monitor and track water usage in these facilities.

Row 2

(9.1.1.1) Exclusion

Select from:

☑ Facilities

(9.1.1.2) Description of exclusion

Douglas Power Plant

(9.1.1.3) Reason for exclusion

Select from:

☑ Small volume [rainwater]

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:

☑ Less than 1%

(9.1.1.8) Please explain

The Douglas Power Plant is excluded from our water consumption calculations because water consumption is minimal to support a net capacity of 16 MW. Water use at the Douglas plant in 2023 was 0.01 megaliters (3,100 gallons) and is considered de minimis to our overall water consumption for power generation.
[Add row]

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors 100% of our water withdrawals. The Cholla, Four Corners, Ocotillo, Palo Verde, Redhawk, Saguaro, Sundance, West Phoenix and Yucca power plants' water use is measured by direct metering from plant personnel and is submitted to Water Resource Management, and monthly reports are compiled and evaluated. This is performed daily or as needed to support operational and/or regulatory requirements. This information is provided to management in monthly progress reports and metric target reports. Because water use is vital for power production, it is important to track actual water usage as a baseline for water goal setting and to meet water conservation targets.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures withdrawals by source (e.g., groundwater, surface water, treated effluent). Withdrawals are measured by direct metering at each plant and the data is submitted to the Water Resource Management team. Measurement is performed daily or as needed to support operational and/or regulatory requirements, then provided to management in monthly progress and metric target reports. This information is reported to the Arizona Department of Water Resources and the New Mexico State Engineer as applicable. It is important to understand the source of the water withdrawal to identify potential watershed impacts and as a baseline for goal setting. In 2024, 71% of APS withdrawals were treated effluent (reclaimed water from municipal wastewater), 17% was surface water, and 12% was groundwater.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors water quality at the Cholla, Four Corners, Ocotillo, Palo Verde, Redhawk, Saguaro, Sundance, West Phoenix, and Yucca power plants to ensure that water chemistry will have no adverse impact on generation or on water delivery or treatment infrastructure. Tests are performed daily, or as needed, to support operational and/or regulatory requirements. This information is measured by direct analysis in on-site labs or via collected samples sent to contract labs. The data is then recorded in databases and reported to the Arizona Department of Environmental Quality on frequencies as dictated by plant-specific permits.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors 100% of water discharge volumes at applicable facilities including Four Corners, Ocotillo, Sundance, West Phoenix, and Yucca Power Plants. APS's remaining power plants reuse water as much as feasible, concentrate wastewater streams where possible, and store residual consumed water in a controlled manner on-site for evaporation. Water discharge measurement is performed daily to support operational and/or regulatory requirements. Information is collected through direct metering and is provided to Water Resource Management and/or the plant's Environmental Department, then provided to appropriate regulatory authorities and management in monthly progress and metric target reports. Applicable information is reported on to the AZ Dept of Water Resources, AZ Dept of Environmental Quality and to the NM State Engineer and/or USEPA Region IX for compliance purposes as applicable. Accurate discharge data is needed to calculate and report water consumption.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors 100% of water discharge volumes by destination in compliance with regulatory requirements at Four Corners, Ocotillo, Sundance, West Phoenix, and Yucca power plants. Discharge destinations include publicly owned treatment works (i.e., sanitary sewers), a river, or other water reclamation systems (including agricultural use). Flow monitoring information is collected daily, as applicable, through direct metering and is provided to Water Resource Management and/or the plant's Environmental Department, then provided to appropriate regulatory authorities and management in monthly progress and metric target reports. We report this information to the AZ Dept of Water Resources, AZ Dept of Environmental Quality and to the NM State Engineer and/or the USEPA Region IX for compliance purposes, as applicable. Tracking the volume discharged by destination provides data regarding potential impacts on the Phoenix AMA and the San Juan watershed.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors 100% of our water discharge volumes at our power plants by treatment method which principally includes heat dissipation in a cooling lake. Measurement is performed daily or as needed. This information is collected through direct metering and is provided to Water Resource Management and/or the plant's Environmental Department where reports are compiled and evaluated in monthly progress and metric target reports. We report this water discharge volume on an annual basis to the New Mexico State Engineer, quarterly to the Arizona Department of Environmental Quality, and USEPA Region IX for compliance purposes, as

applicable. APS treatment methods are identified in procedures at each power plant to optimize and encourage recycling when possible. Discharge volume, water quality, discharge locations, and impacts to the watershed are accurately recorded and reported as required in site-specific permits.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors the water discharge quality data at all plants that discharge to waters of the U.S. or to publicly owned treatment works to ensure effluent quality standards are met. In some cases, water quality is measured daily. Water quality information for discharges to municipal publicly owned treatment works is reported to the Cities of Tempe and Phoenix, Arizona as applicable. Additional wastewater discharge quality information is reported to the Arizona Department of Environmental Quality (ADEQ) and our Four Corners discharge data are reported to USEPA Region IX, (as to Four Corners discharges) and must meet federal compliance requirements.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

APS has multiple environmental com pliance programs that protect water ecosystems and human health from potential water pollutants associated with our business activities. Examples include our National Pollutant Discharge Elimination System (NPDES) and Arizona Aquifer Protection Permit compliance programs. NPDES compliance efforts identify and classify potential water pollutants in permitted discharges from our facilities into regulated waterways through internal monitoring of existing pollutants and ensuring that all treatment system discharges comply with permit limits, Pre-treatment Local Limits and/or Surface Water Quality Standards, as applicable. We adhere to applicable Effluent Limitation Guidelines and Clean Water Act requirements to identify and treat, if present, discharge of conventional pollutants (BOD, TSS, pH, oil and grease), 65 Priority Pollutants, and 126 Priority Toxic Pollutants.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS monitors water temperature at each plant that has a surface water discharge permit with a requirement to do so (either for direct discharge or via a publicly owned treatment works). Water temperature is measured continuously with an autoanalyzer at APS's Four Corners Power Plant in accordance with the facility's National Pollutant Discharge Elimination System (NPDES) permit issued by USEPA Region IX. At our West Phoenix Power Plant, temperature is monitored on a weekly basis per the facility's wastewater discharge permit issued by the City of Phoenix.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures and monitors 100% of our water consumption by total volume at the Cholla, Four Corners, Ocotillo, Palo Verde, Redhawk, Saguaro, Sundance, West Phoenix, and Yucca power plants. This information is collected daily through direct metering and is provided to Water Resource Management, then provided to management in monthly progress and metric target reports. This information is also reported on an annual basis to the Arizona Department of Water Resources and monthly to the New Mexico State Engineer for compliance purposes. Other water uses, such as in office buildings and service centers are served by a municipal provider. APS's Facilities department monitors water consumption in office buildings and service centers. In 2024, APS plants total water consumption was approximately 126,013 megaliters.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Metering

(9.2.4) Please explain

APS measures 100% of water that is recycled/reused at Redhawk, West Phoenix, Palo Verde, Cholla, and Four Corners Power Plants. Water reuse is measured at West Phoenix and Redhawk, which utilize zero-liquid discharge systems to concentrate wastewater streams and produce water for reuse. Palo Verde reuses municipally produced effluent for cooling water, which corresponds to 95% of water used at the plant. Cholla reuses bottom ash sluice water and cooling water in separate recirculation systems. Four Corners uses a cooling lake with a water recirculating system. Of the water withdrawn from the San Juan River, approximately 6% was returned back to the river in 2024. The remaining water is routed through the plant's cooling-water recirculation system, where approximately 94% of the water withdrawn from the river is recirculated for cooling and plant processes. Cycles of concentration are monitored on a daily basis through direct metering and reported to management and regulatory agencies.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

127807

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:
☑ Other, please specify :Minimal changes in operations

(9.2.2.4) Five-year forecast

Select from:
☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Facility closure

(9.2.2.6) Please explain

The total withdrawals at the Cholla, Four Corners, Ocotillo, Palo Verde, Redhawk, Saguaro, Sundance, West Phoenix, and Yucca Power plants for 2024 (127,807 megaliters/year) were lower than in 2023 (127,092 megaliters/year). This is 0.006% more than in 2023. (Year-to-year changes less than 5% are considered "about the same." Year-to- year changes between 5% and 15% are considered "higher"/"lower". Year-to-year changes over 15% are considered "much higher"/"much lower".)

Total discharges

(9.2.2.1) Volume (megaliters/year)

1794

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Much higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify :Change in operational conditions

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Other, please specify :Consistent operational conditions

(9.2.2.6) Please explain

The total discharge at the Four Corners, Ocotillo, and West Phoenix Power Plants were much higher in 2024 1,794 megaliters/year) than in 2023 (1,623 megaliters/year). The discharges were much higher than last year (188%) for the plants that have a discharge component. This was primarily due to operational changes at Four Corners. (Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower". Year-to-year changes over 15% are considered "much higher"/'much lower".

Total consumption

(9.2.2.1) Volume (megaliters/year)

126013

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify :Minimal change in operations

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Facility closure

(9.2.2.6) Please explain

The total consumption at the Cholla, Four Corners, Ocotillo, Palo Verde, Redhawk, Saguaro, Sundance, West Phoenix, and Yucca Power Plants for 2024 (126,013 megaliters/year) were about the same as in 2023 (126,469 megaliters/year). This is a 0.36% reduction. Our reported volumes of water of are calculated by the following formula: 126,013 (total consumption) = 127,807 (total withdrawals) – 1,794 (total discharges). (Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower.")
[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☑ No

(9.2.4.8) Identification tool

Select all that apply

☑ Other, please specify :Bureau of Reclamation modelling and groundwater flow modelling

(9.2.4.9) Please explain

APS requires each plant to demonstrate the water availability and pumping capacity to support 100% of plant generating capacity during the summer run, the period of greatest potential stress. All of our plants have access to freshwater that meet the demands of generation. APS holds more than sufficient rights at each plant and has infrastructure to deliver water to each plant. For example, the Palo Verde Generation Station and Redhawk Power Plant use treated effluent, which is considered a drought-resistant supply, because water conservation during a drought is primarily to reduce outdoor water use, not indoor water use. Indoor water use is what supplies effluent to water treatment facilities that provide water to Palo Verde and Redhawk. Our contracted supply of treated effluent is of adequate quantity and quality for the generation needs of these plants through 2050. 71% of all APS power plant water consumption was treated effluent in 2024. The remaining 29% is groundwater or surface water is protected by water rights, contracts, and agreements. Although drought continues in the western U.S. and in the Colorado River Basin, APS supported the Lower Colorado River Drought Contingency Plan endorsed by Arizona, Nevada, California, and Mexico, resulting in more water being stored in Lake Mead and protecting the region against serious future water shortages. In 2024, U.S. Secretary of the Interior declared a Tier 1 shortage on the Colorado River. Even in the event of a more severe water shortage declaration on the Colorado River, APS power plants will not be impacted due to water rights, contracts, agreements, and reliance on essentially drought-proof treated effluent.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

24856

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Not relevant

Groundwater – renewable

(9.2.7.1) Relevance

Select from:
☑ Not relevant

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

14408

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Other, please specify :Minimal changes in operations

(9.2.7.5) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

89419

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify :Minimal changes in operations

(9.2.7.5) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

1314

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Much higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify :Change in operations

(9.2.8.5) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

Groundwater

(9.2.8.1) Relevance

Select from:
☑ Not relevant

Third-party destinations

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

480

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Other, please specify :Change in operations

(9.2.8.5) Please explain

Permitted discharges to sanitary sewer
[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Relevant

(9.2.9.2) Volume (megaliters/year)

1314

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Much higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify :Changes in operations

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

480

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Other, please specify :Change in operations

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

	Identification of facilities in the value chain stage	Total number of facilities identified
Direct operations	*Select from:* ☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities	*9*

[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:
☑ Facility 1

(9.3.1.2) Facility name (optional)

Palo Verde Generating Station

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

United States of America

☑ Other, please specify :Phoenix Active Management Area

(9.3.1.8) Latitude

33.395277

(9.3.1.9) Longitude

-112.858333

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Nuclear

(9.3.1.13) Total water withdrawals at this facility (megaliters)

86287

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

55

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

1935

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

84299

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

86287

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ About the same

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 9

(9.3.1.2) Facility name (optional)

Yucca Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Colorado River

(9.3.1.8) Latitude

32.719722

(9.3.1.9) Longitude

-114.713333

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

172

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

172

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

172

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much higher

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 5

(9.3.1.2) Facility name (optional)

Sundance Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Pinal Active Management Area

(9.3.1.8) Latitude

32.927941

(9.3.1.9) Longitude

-111.588993

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

306

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

306

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

306

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Higher

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 4

(9.3.1.1) Facility reference number

Select from:

☑ Facility 7

(9.3.1.2) Facility name (optional)

Cholla Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Joseph City Irrigation Non-expansion Area

(9.3.1.8) Latitude

34.940654

(9.3.1.9) Longitude

-110.299623

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Coal - hard

(9.3.1.13) Total water withdrawals at this facility (megaliters)

6465

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

249

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

6217

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

6465

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 5

(9.3.1.1) Facility reference number

Select from:

☑ Facility 6

(9.3.1.2) Facility name (optional)

Saguaro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Tucson Active Management Area

(9.3.1.8) Latitude

32.553903

(9.3.1.9) Longitude

-111.299829

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

11

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

11

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

11

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ Much lower

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 6

(9.3.1.1) Facility reference number

Select from:

☑ Facility 3

(9.3.1.2) Facility name (optional)

West Phoenix Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Phoenix Active Management Area

(9.3.1.8) Latitude

33.440277

(9.3.1.9) Longitude

-112.162777

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

5040

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

5040

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

424

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

424

(9.3.1.27) Total water consumption at this facility (megaliters)

4616

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Higher

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 7

(9.3.1.1) Facility reference number

Select from:

☑ Facility 8

(9.3.1.2) Facility name (optional)

Four Corners Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :San Juan River Basin

(9.3.1.8) Latitude

36.685009

(9.3.1.9) Longitude

-108.479176

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Coal - hard

(9.3.1.13) Total water withdrawals at this facility (megaliters)

24248

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

24248

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

1314

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

1314

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

22934

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Higher

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 8

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

Redhawk Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Phoenix Active Management Area

(9.3.1.8) Latitude

33.336229

(9.3.1.9) Longitude

-112.840533

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

4976

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

732

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

4244

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

4976

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Higher

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."

Row 9

(9.3.1.1) Facility reference number

Select from:

☑ Facility 4

(9.3.1.2) Facility name (optional)

Ocotillo Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Afghanistan

☑ Other, please specify :Phoenix Active Management Area

(9.3.1.8) Latitude

33.428888

(9.3.1.9) Longitude

-111.910277

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

304

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

304

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

56

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

56

(9.3.1.27) Total water consumption at this facility (megaliters)

247

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ Much lower

(9.3.1.29) Please explain

Year-to-year changes of less than 5% are considered "about the same." Year-to-year changes between 5% and 15% are considered "higher"/"lower." Year-to-year changes over 15% are considered "much higher"/"much lower."
[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.

Water consumption – total volume

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

APS's water withdrawal data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000.
[Fixed row]

(9.7) Do you calculate water intensity for your electricity generation activities?

Select from:
☑ Yes

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

☑ Water

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Water security

☑ Water discharges– total volumes

☑ Water withdrawals– total volumes

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

The water use and discharge data has been verified for CY2023: Palo Verde, Four Corners, Redhawk, Cholla, Ocotillo, Saguaro, Sundance, West Phoenix, and Yucca. APS's water withdrawal and discharge data was verified in accordance with the guidelines set forth in the International Standard on Assurance Engagements (ISAE) 3000. Verification of APS's water data for CY2024 was constructed to provide a reasonable level of assurance.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

APS CY2024_Verification Opinion.pdf
[Add row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Director Investor Relations

(13.3.2) Corresponding job category

Select from:

☑ Business unit manager
[Fixed row]