



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

Mail Stop 3561

August 24, 2015

James R. Hatfield
Chief Financial Officer
Pinnacle West Capital Corporation
Arizona Public Service Company
400 North Fifth Street
P.O. Box 53999
Phoenix, Arizona 85072

**Re: Pinnacle West Capital Corporation and
Arizona Public Service Company
Form 10-K for Fiscal Year Ended December 31, 2014
Filed February 20, 2015
File No. 1-8962 & 1-4473**

Dear Mr. Hatfield:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ William H. Thompson

William H. Thompson
Accounting Branch Chief
Office of Consumer Products