

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