BEFORE THE ARIZONA CORPORATION COMMISSIONERS

COMMISSIONERS
BOB STUMP - Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF NET METERING COST SHIFT SOLUTION.

DOCKET NO. E-01345A-13-0248
STAFF'S NOTICE OF FILING DATA REQUESTS AND RESPONSES

On August 21, 2013 Commissioner Susan Bitter-Smith requested that the parties file all data requests and responses in this docket. Arizona Corporation Commission Staff ("Staff") hereby files data requests it has issued and has received that were not included in its last filing on August 26, 2013.

RESPECTFULLY SUBMITTED this 12th day of September 2013.

Maureen A. Scott, Senior Staff Counsel
Charles H. Hains, Attorney
Matthew Laudone, Attorney
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
(602) 542-3402

Original and thirteen (13) copies of the foregoing filed this 12th day of September 2013 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
Copy of the foregoing emailed and/or mailed this 12th day of September 2013 to:

Thomas A. Loquvam
Deborah R. Scott
Pinnacle West Capital Corporation
400 North 5th Street, MS 8695
Phoenix, Arizona 85004
Attorney for Arizona Public Service Company
thomas.loquvam@pinnaclewest.com;
deb.scott@pinnaclewest.com

Lewis M. Levenson
1308 East Cedar Lane
Payson, Arizona 85541
equality@centurylink.net

Anne Smart, Executive Director
Alliance for Solar Choice
45 Fremont Street, 32nd Floor
San Francisco, California 94105
anne@allianceforsolarchoice.com

Garry D. Hays
Law Offices of Garry D. Hays, P.C.
1702 East Highland Avenue, Suite 204
Phoenix, Arizona 85016
Attorney for Arizona Solar Deployment
Alliance
ghays@lawgdh.com

Greg Patterson
916 West Adams, Suite 3
Phoenix, Arizona 85007
Attorney for Arizona Competitive Power
Alliance
greg@azcpa.org

Patty Ihle
304 East Cedar Mill Road
Star Valley, Arizona 85541
apattywack@yahoo.com

Michael W. Patten
Jason Gellman
Roshka DeWulf & Patten, PLC
One Arizona Center
400 East Van Buren, Suite 800
Phoenix, Arizona 85004
Attorneys for Tucson Electric Power
Company and UNS Electric, Inc.
mpatten@rdp-law.com
jgellman@rdp-law.com

Bradley S. Carroll
Kimberly A. Ruht
Tucson Electric Power Company
88 East Broadway Boulevard, MS HQE910
Post Office Box 711
Tucson, Arizona 85702
bearroll@tep.com
kruht@tep.com

Daniel W. Pozefsky, Chief Counsel
Residential Utility Consumer Office
1110 West Washington, Suite 220
Phoenix, Arizona 85007
dpozefsky@azruco.gov

John Wallace
Grand Canyon State Electric Cooperative
Association, Inc.
2210 South Priest Drive
Tempe, Arizona 85282
jwallace@gcsenca.coop

Court S. Rich
Rose Law Group PC
6613 North Scottsdale Road, Suite 200
Scottsdale, Arizona 85250
jwallace@gcsenca.coop

Todd G. Glass
Keene M. O’Connor
Wilson Sonsini Goodrich & Rosati, PC
701 Fifth Avenue, Suite 500
Seattle, Washington 98104
tglass@wsgr.com

Hugh L. Hallman
Hallman & Affiliates, PC
2011 North Campo Alegre Road
Suite 100
Tempe, Arizona 85281
Attorney for The Alliance for Solar Choice
hallmanlaw@pobox.com

Timothy M. Hogan
Arizona Center for Law in the Public Interest
202 East McDowell Road, Suite 153
Phoenix, Arizona 85003
Attorney for Western Resource Advocates
thogan@aclpi.org
I

David Berry
Western Resource Advocates
Post Office Box
Scottsdale, Arizona 85252-1064
David.berry@westernresources.org

Giancarlo G. Estrada
Estrada-Legal, PC
One East Camelback Road
Suite 550
Phoenix, Arizona 85012
gestrada@estradalegalpc.com

[Signature]

[Handwritten Name: Christine]
August 27, 2013

VIA ELECTRONIC MAIL
Maureen A. Scott, Senior Staff Counsel
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007-2927
mscott@azcc.gov

Re: APS’s First Set of Data Requests to Arizona Corporation Commission,
Docket No. E-01345A-13-0248

Dear Ms. Scott:

This letter encloses APS’s First Set of Data Requests to the Arizona Corporation Commission (ACC) in the above-referenced matter.

For purposes of this data request set, the words “you” and “your” refer to ACC, and any representative of ACC, as well as every person and/or entity acting with, under the control of, or on behalf of ACC. For each answer, please identify, by name, title and address each person providing the information that forms the basis for the response provided.

These data requests are continuing. Please supplement the answers, and any documents supplied in response to these data requests, with any additional information or documents that come to your attention after you have provided your initial responses. Please respond within ten (10) business days. Should you require additional time, please contact me immediately.

Please send electronic and regular delivery service of your responses to the contact information above.

Should you have any questions or comments, please feel free to contact me directly.

Sincerely,

Thomas A. Loquvam
TAL/dk
APS'S FIRST SET OF DATA REQUESTS TO ACC
Docket No. E-01345A-13-0248

APS 1.1 For all Data Requests served upon ACC from any other party, including Commission Staff, in the above-referenced docket, provide:

a) the Data Requests; and

b) ACC’s complete responses.

APS 1.2 For all Data Requests served by ACC upon any other Party (other than APS), including Commission Staff, in the above-referenced docket, provide:

a) the Data Requests; and

b) the Party’s complete responses.
August 23, 2013

Thomas A. Loquvam  
Pinnacle West Capital Corporation  
400 North 5th Street, MS 8695  
Phoenix, Arizona 85004

Re: Staff’s Second Set of Data Requests to Arizona Public Service Company  
Docket No. E-01345A-13-0248

Dear Mr. Loquvam:

Please treat this as Staff’s Second Set of Data Requests to Arizona Public Service Company in the above-referenced matter.

For purposes of this data request set, the words “APS,” “Company,” “you,” and “your” refer to Arizona Public Service Company and any representative, including every person and/or entity acting with, under the control of, or on behalf of Arizona Public Service Company. For each answer, please identify by name, title, and address each person providing information that forms the basis for the response provided.

These data requests are continuing, and your answers or any documents supplied in response to these data requests should be supplemented with any additional information or documents that come to your attention after you have provided your initial responses.

Please respond within ten calendar days of your receipt of the copy of this letter. However, if you require additional time, please let us know.

Please provide one hard copy as well as searchable PDF, DOC or EXCEL files (via email or electronic media) of the requested data directly to each of the following addressees via overnight delivery services to:

(1) Richard Lloyd, Utilities Division, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007, rlloyd@azcc.gov.

(2) Connie Fitzsimmons, Paralegal, Legal Division, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007, cfitzsimmons@azcc.gov.

Sincerely,

Maureen A. Scott, Senior Staff Counsel  
Charles H. Hains, Attorney  
Matthew Laudone, Attorney  
Legal Division  
(602) 542-3402  

Enclosure
Subject: All information responses should ONLY be provided in searchable PDF, DOC or EXCEL files via email or electronic media.

RL 2-1: APS’ instant application requests expedited ACC review of the referenced filing, implying a certain level of urgency in the subject matter of the filing. APS’ application also references that the net metering cost-shift issue was discussed in APS’ 2005 general rate case proceedings. Please explain why the Net Metering (“NM”) cost shift issue was not addressed or discussed in APS’ most recent (2011) general rate case proceedings, yet now requires the expedited attention of the Commission.

RL 2-2: Did APS consider the use of a Standby Charge as a potential bridge solution to the NM cost-shift issue? Please explain why a Standby Charge was not proposed as a possible bridge solution.

RL 2-3: Did APS analyze whether the NM cost-shift issue could satisfactorily be addressed on a long-term basis through revision to the state’s Net Metering Rules? What specific changes to the NM Rules would address the cost-shift issue?

RL 2-4: APS states in the instant application that new NM customers are entering APS’ system at the rate of approximately 500 per month, or 6,000 per year. What does APS forecast for the rate of NM adoption in the future, if (a) APS’ Net Metering ECT-2 option; or (b) APS’ Bill Credit option was approved by the Commission?

RL 2-5: Please provide a table showing the number of solar applications by month that APS has received from January 2011 through July 2013, disaggregated by customer class (i.e. residential and commercial). Provide similar information for the number of actual installations added during the stated timeframe. Add notations to the time scale indicating each time UFI’s changed and what the UFI was at each change point.