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Garry D. Hays
The Law Offices of Garry D. Hays, PC
1702 East Highland Avenue, Suite 204
Phoenix, Arizona 85016
Attorney for Arizona Solar Deployment Alliance
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Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

COPIES of the foregoing mailed

W.R. Hansen
Sun City West Property Owners and Residents Associations
13815 W. Camino Del Sol
Sun City West, AZ 85375

Anne Smart
Alliance for Solar Choice
45 Fremont Street, 32nd Floor
San Francisco, CA 94105

Mark Holohan
Arizona Solar Energy Industries Associations
2221 West Lone Cactus Drive, Suite 2
Phoenix, AZ 85027

David Berry
P.O. Box 1064
Scottsdale, AZ 85252-1064

Erica Schroeder
436 14th Street, Suite 1305
Oakland, CA 94612

Timothy Hogan
202 E. McDowell Road, Suite 153
Phoenix, AZ 85004

Giancarlo Estrada
Estrada Legal, PC
1 East Camelback Road, Suite 550
Phoenix, AZ 85012

Tim Lindl
Keyes, Fox & Wiedman, LLP
436 14th Street, Suite 1305
Oakland, CA 84612
Kevin Fox  
Keyes, Fox & Wiedman, LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612

Hugh Hellman  
Hellman & Affiliates, PC  
2011 N. Campo Alegre Road, Suite 100  
Tempe, AZ 85281

Todd Glass  
Wilson Sonsini Goodrich & Rosati, PC  
701 Fifth Ave, Suite 5100  
Seattle, WA 98104

Court Rich  
6613 N. Scottsdale Road, Suite 200  
Scottsdale, AZ 85250

Patty Ihle  
304 E. Cedar Mill Road  
Star Valley, AZ 85541

Michael Patten  
Roshka Dewulf & Patten, PLC  
One Arizona Center  
400 E. Van Buren, Suite 800  
Phoenix, AZ 85004

Greg Patterson  
Water Utility Association of Arizona  
916 W. Adams, Suite 3  
Phoenix, AZ 85007

Daniel Pozefsky  
1110 West Washington, Suite 220  
Phoenix, AZ 85007

Bradley Carroll  
88 E. Broadway Blvd. MS HQE910  
P.O. Box 711  
Tucson, AZ 85702

John Wallace  
2210 South Priest Drive  
Tempe, AZ 85282

Lewis Levenson  
1308 E. Cedar Lane  
Payson, AZ 85541

Janice Alward  
1200 W. Washington  
Phoenix, AZ 85007

Steve Olea
1200 W. Washington
Phoenix, AZ 85007

Lyn Farmer
1200 W. Washington
Phoenix, AZ 85007

Thomas Loquvam
400 N. 5th Street, MS 8695
Phoenix, AZ 85004

Chanielle Hergel
RESPONSE TO COMMISIONER BOB BURNS' OCTOBER 30 LETTER

The Arizona Solar Deployment Alliance ("ASDA") submits this response to Commissioner Bob Burns' October 30 letter regarding net metering. The questions asked by Commissioner Burns are listed below with ASDA's response immediately following.

1) How much money did your company, organization, shareholders, members and/or parent company spend concerning net metering?

ASDA is an organization that is comprised of a five-member board of directors who are involved in the solar installation industry in Arizona. ASDA and its board have spent no money on outside PR, advertising, email campaigns or anything that involved the recent amount of attention on net metering. ASDA did employ a lobbyist that was responsible for multiple issues for the organization and has updated its web site with information on net metering. While ASDA did not break out the pay for the lobbyist by project or the web developer by page or update, based upon the amount of time both parties spent on net metering, ASDA assumes less than was $10,000 was spent on net metering.

2) Please provide the approximate number of hours your salaried staff spent on the public relations campaign to support your position.

ASDA and its members have not had any of its employees work on any PR or advertising campaign for net metering.

3) If you are a regulated utility, will you be seeking to recover in a future rate case funds expended to promote your views?

N/A
RESPONSE TO COMMISSIONER PIERCE’S OCTOBER 17 LETTER

The Arizona Solar Deployment Alliance ("ASDA") submits this response to Commissioner Pierce’s October 17 letter regarding net metering.

Rate Case

ASDA believes a full evidentiary hearing is needed on this matter. Your letter states:

“If the Commission were to conclude that Net Metering results in a cost shift, the question becomes how and when the Commission should offer a policy solution that addresses it. The fact is that APS will not be filing a rate case until 2015, with new rates going into effect no sooner than July 2016. The length of time involved would increase the problem that would need to be solved at that time.”

Due to the ratemaking nature of APS’ application, ASDA believes the Commission risks overcharging residential DG solar customers between now and the next rate case, should APS even bring this issue to the Commission when they file their next rate case. As Staff stated in their recommendation, there are “subjective” and “objective” values associated with DG solar that have yet to be defined. The only way to ensure a just, fair and reasonable assignment of these values to the benefit of DG solar customers is to hold workshops to define the values and then follow them with evidentiary hearings as part of a rate case. It is possible that the Commission could find, after defining the values of DG solar and applying them to APS’ customer base during a rate case, that a cost-shift between DG solar customers and non-DG solar customers is not occurring or is negligible compared to other known cost-shifts that have been accepted and absorbed into rates as part of prior rate cases.

Staff Alt 2

ASDA strongly opposes Staff Alt 2 and similar proposals. The possibility of imposing charges of the amount contemplated by Staff Alt 2 and similar proposals, such as RUCO’s, runs the risk of:

1. Significantly overcharging DG solar customers with PV systems.
2. Creating “rate shock” on new DG solar customers.
3. Elimination of market participation and ensuing loss of industry.
4. Failure to attain RES compliance objectives for residential DG carve-out.

Additionally, ASDA has concerns about Staff Alt 2’s design. Your letter raises the following question:

“What is the most realistic Assumed Utility Scale PPA Rate?”
At this time, this data is unknown to ASDA and we are unaware of existing PPAs in the size range you call out in your letter that have been installed in APS service territory. ASDA believes the Commission has data from APS indicating historical PPA prices and recommends it not look at theoretical PPA costs, but rather the costs of existing Utility Scale PPA Rates for contemplating Staff Alt 2. APS has, in its 2012 REST Compliance Report, used excess DG solar to offset wholesale renewable resources, one for one. As such, ASDA recommends the Commission apply the existing methodology used to determine the “Annual Purchase Rates for Excess Generation” found in APS Rate Plan EPR-6 and substitute existing Utility Scale Solar PPAs for conventional generation to determine a fair offset value. Additionally, because transmission is part of the offset value, corresponding transmissions charges should identified and included in the offset value of Utility Scale Solar PPAs used in Staff Alt 2.

Clearly, if APS adds new Utility Scale Solar PPAs in the future, the blended average would decrease if the cost of the new PPAs was below the blended average prior to the addition of the new PPAs to APS’ portfolio, thereby eliminating theoretical costs from Staff’s model.