August 8, 2014

Bob Stump, Chairman
Gary Pierce, Commissioner
Brenda Burns, Commissioner
Susan Bitter Smith, Commissioner
Bob Burns, Commissioner

Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996

Re: E-01345A-13-0248, In the matter of the application of Arizona Public Service Company for approval of net metering cost shift solution.

The Southwest Energy Efficiency Project (SWEEP) appreciates the opportunity to provide these comments in response to the letters of Chairman Bob Stump, Commissioner Bob Burns, Commissioner Brenda Burns, and Commissioner Susan Bitter Smith on the possible initiation of a generic process to address rate design issues.

SWEEP supports a generic proceeding or a workshop process to discuss a broad range of rate design issues. A generic proceeding or workshops would offer the Commission and stakeholders a forum to explore rate design issues across companies and to examine models that have been effective in other jurisdictions.

This process should not seek to resolve any specific rate design issues or any rate design issues for a particular group of ratepayers. SWEEP urges the Commission to continue to make such decisions as part of the full rate case process where a company’s specific situation can be thoroughly examined, commented on, and determined by the Commission.

Thank you for the opportunity to submit these comments.

Respectfully submitted this 8th day of August 2014 by:

Jeff Schlegel & Ellen Zuckerman
Southwest Energy Efficiency Project

ORIGINAL and thirteen (13) copies filed this 8th day of August 2014, with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street