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BEFORE THE ARIZONA CORPORATION COMMISSION

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9)	
10)	
11)	DOCKET NO. U-0000-94-165
12)	
13)	ASARCO, INCORPORATED'S,
14)	BHP COPPER INC.'S AND
15)	CYPRUS BAGDAD COPPER
16)	CORPORATION'S COMMENTS
17)	ON DRAFT RULE PROPOSED
18)	BY STAFF ON AUGUST 28,
19)	1996
20)	
21)	

In 1994 the Arizona Corporation Commission opened this docket for the purpose of investigating the feasibility of allowing retail electric competition for residential, commercial and large industrial consumers of electricity in the State of Arizona. In February, 1996 the staff of the Commission requested interested parties to provide comments on mechanisms for implementing retail competition. In June, 1996 the staff requested interested parties to respond to several questions about implementation of retail competition.

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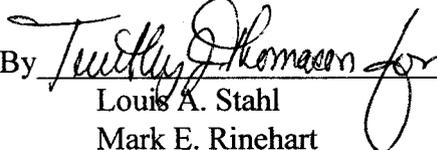
On August 28, 1996, staff issued a draft rule (the "Rule") for gradual introduction of retail competition in Arizona's regulated electric industry. Public comments on the Rule were requested to be filed by September 12, 1996.

ASARCO, Incorporated ("Asarco"), BHP Copper Inc. ("BHP") and Cyprus Bagdad Copper Corporation ("Cyprus") jointly provide the attached comments on the Rule.

Respectfully submitted this 12th day of September, 1996.

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Introduction

Asarco, BHP and Cyprus support the objectives of the Rule. The companies recognize that the Rule seeks to balance various interests and objectives while providing a transition to retail competition in the electric industry.

Asarco, BHP and Cyprus have the following comments and recommendations for changes in the Rule.

R14-2-xxx1. Definitions

Proposed Change

A definition of the term "Eligible Demand" should be added as follows:

- 5. *"Eligible Demand" means the total customer kW demand which an Affected Utility must make available to be provided by competitive generation supply under the terms of this Article, or the total customer kW demand actually provided by competitive generation supply in an Affected Utility's distribution service territory, whichever is greater.*

Other definitions in this section should be renumbered as required, i.e., 6 through 8.

Explanation of Proposed Change

The term "Eligible Demand" is used in R14-2-xxx4.A. and B. of the proposed draft rule, but is not explicitly defined in the Rule. The first part of the definition proposed above follows the meaning that is implicit in staff's use of the term in the Rule.

The second part of the definition proposed above is necessary to address the situation in which total customer demand provided by competitive generation exceeds the

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1 minimum mandated. In such an instance, the capacity ceiling on the competitive generation
2 supply available to customers with individual demands greater than 3 MW (if retained in the
3 Rule) should be raised proportionately.
4

5 **R14-2-xxx2. Filing of Tariffs by Affected Utilities.**

6 No change required.
7

8 **R14-2-xxx3. Certificate of Convenience and Necessity.**

9 **B.**

10 Proposed Change

11 Delete subparagraph R14-2-xxx3.B.9.
12

13 Explanation of Proposed Change

14 Subparagraph 9 is unnecessary because companies supplying electrical
15 services in Arizona would be required, under subparagraph 6, to provide the Commission
16 with "a description of . . . technical ability to obtain and deliver" all proposed services, and
17 they would be required under subparagraph 7 of proposed rule R14-2-xxx3.B. to provide
18 extensive financial information and "other pertinent information," audited if available. These
19 requirements make redundant the requirements of subparagraph 9 that such companies also
20 provide the Commission with an Arizona "business plan," especially in light of the fact that
21 Arizona business plans are likely to be highly confidential. As drafted, subparagraph 9 is
22 likely to be perceived by independent suppliers as burdensome and perhaps anti-competitive.
23 If this perception occurs, the result could have a chilling effect on the willingness of
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independent suppliers to participate in a competitive market in Arizona. This in turn might deprive Arizona consumers of the full benefits of competition that the Rule seeks to encourage.

D. and E.

Proposed Change

Proposed rules R14-2-xxx3.D and R14-2-xxx3.E should be deleted or, at least, the degree of Commission oversight called for in the rules should be substantially reduced, by being limited only to oversight of safety and the reliability of service provided by suppliers of electricity in a competitive market.

Explanation

Proposed rules R14-2-xxx3.D and R14-2-xxx3.E provide the Commission with unnecessarily broad regulatory powers in a competitive market. In the case of proposed Rule R14-2-xxx3.D, the Commission should rely on market forces to exclude suppliers of services who lack "adequate technical or financial capabilities to provide the proposed services."

In the case of proposed rule R14-2-xxx3.E, it is not necessary, in a competitive market, that all suppliers be required to comply with "all Commission rules, orders, and other requirements," nor that suppliers file with the Director "all financial and other reports that the Commission may require."

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R14-2-xxx4. Competitive Phases.

A.

Proposed Change

The date in proposed Rule R14-2-xxx4.A should be changed as follows:
change "January 1, 1999" to "January 1, 1998".

Explanation of Proposed Change

The public interest will be better served by making the benefits of retail access available to consumers at the earliest achievable date.

1.

Proposed Change

Delete R14-2-xxx4.A.1.

Explanation of Proposed Change

Proposed R14-2-xxx4.A.1 provides that "no more than one-half of the Eligible Demand may be procured by consumers whose individual contract demand is greater than 3 MW each" [defined term "Eligible Demand" added to the quotation in accordance with comments above]. This limitation on participation in the competitive market may introduce arbitrary impediments to market participation by customers who can otherwise benefit from competition. Such customers may be foreclosed from full participation in the market if the proposed "50 percent of Eligible Demand" ceiling is reached -- even if the overall Eligible Demand level is not fully utilized by other customers. Asarco, BHP and Cyprus believe that such market distortions are undesirable and, therefore, the companies believe that implementation of retail access would be more efficiently achieved if proposed Rule R14-2-

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1 xxx4.A.1 were deleted. The requirement of R14-2-xxx4.A.2 that at least 10 percent of
2 Eligible Demand be reserved for residential consumers in the first year of the program (and
3 20 percent by the third year of the program) adequately addresses the objective of diversity
4 in participation.

5 Alternative Proposed Change

6 If, notwithstanding the foregoing, a ceiling is to be imposed on large customer
7 participation, Asarco, BHP and Cyprus believe that R14-2-xxx4.A.1 should be revised to
8 read as follows:

- 9
10 1. *No more than one-half of Eligible Demand may be procured*
11 *in transactions involving individual contract demands*
12 *exceeding 3 MW at single delivery points.*

13 Explanation of Alternative Proposed Change I

14 The phrase "at single delivery points" is necessary to maintain parity with the
15 current definition of "extra-large customer" on the APS system and will be consistent with
16 differentiation of individual customers as applied to the assignment of fixed customer
17 charges either for traditional bundled service or for unbundled transmission and/or
18 distribution service.

19 The language proposed by staff, in addition to expanding the number of extra-
20 large customers beyond the current definition, will lead to interpretation problems, as single
21 companies with multiple delivery points may opt for multiple, as opposed to single, contracts
22 to purchase competitive generation. The use of the "single delivery point" concept will help
23 avoid this and other similar types of difficulties.

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Alternative Proposed Change II for R14-2-xxxA.

This alternative change should be implemented either in combination with Alternative Proposed Change I proposed above, or on a stand-alone basis. R14-2-xxxA should be revised to include a new paragraph 4 that provides as follows:

- 4. *If, twelve months following the introduction of the 20 percent competitive phase, there exists unallocated Eligible Demand, it shall be made available to customers whose individual demands exceed 3 MW at single delivery points, if these customers are otherwise unable to participate in the competitive market due to the ceiling imposed in R14-2-xxxA.1.*

Explanation of Alternative Proposed Change II for R14-2-xxxA.

The potential economic distortion which may result if a class of customers is arbitrarily constrained from participating in the competitive market can be mitigated by allowing them to participate if Eligible Demand remains unused after other customers have had a year to choose participation.

This comment also applies in concept to R14-2-xxx4.B of the Rule.

B.

Proposed Change

Dates should be changed in R14-2-xxx4.B as follows: change "January 1, 2001" to "January 1, 2000".

Explanation of Proposed Change

The public interest will be better served by making the benefits of greater retail access available at an earlier date.

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1.

Proposed Change

R14-2-xxx4.B.1 should either be eliminated or, at least, modified, to read as follows:

1. *No more than one-half of the Eligible Demand may be procured in transactions involving individual contract demands exceeding 3 MW at single delivery points.*

Explanation of Proposed Change

See the comments above concerning R14-2-xxx4.A.1; implementation of retail competition in Arizona will be more timely and efficiently achieved by the change.

C.

Proposed Change

Change the phrase "available kw" contained in R-2-xxx4.C to "Eligible Demand."

Explanation of Proposed Change

When the Rule was initially proposed by staff, the phrase "available kW" was intended to have the same meaning as the phrase "Eligible Demand." The proposed change merely makes this intention clear.

G.

Proposed Changes

Eliminate subparagraphs R14-2-xxx4.G.2. Then modify R14-2-xxx4.G.3 to read as follows:

3. *Beginning June 30, 1997, each Affected Utility shall make at least 5 percent of its 1995 system retail peak*

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demand available for competitive procurement under this Buy-through mechanism. Buy-through arrangements in place prior to adoption of this rule, as well as all buy-through arrangements that are entered into prior to June 30, 1997, shall not be included as part of the calculation of an Affected Utility's 5 percent minimum requirement as provided in the previous sentence. In addition, until June 30, 1997 nothing in this rule shall be construed as preventing any parties, when in mutual agreement, from entering into buy-through arrangements under Commission rules in existence prior to June 30, 1997.

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Explanation of Proposed Changes

The changes proposed for R14-2-xxx4.G.3 make the provisions of R14-2-xxx4.G.2 unnecessary.

The changes proposed for R14-2-xxx4.G.3 clarify the continued availability of Buy-through arrangements, under existing rules, until the proposed date of June 30, 1997, when the new provisions of R14-2-xxx4.G will become effective.

4.

Proposed Change

Modify the last part of proposed R14-2-xxx4.G.4 to read as follows:

- 4. . . . *Subsection 14-2-xxx6, below, plus the payment made to the off-system provider for the electricity, plus a mark-up not to exceed 15 percent of the payment made to the off-system provider of the electricity.*

Explanation of Proposed Change

The proposed change clarifies that a 15 percent mark up will be allowed on the amount of an Affected Utility's payment to an off system provider, under a Buy-through

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arrangement. As originally proposed, R14-2-xxx4.G.4 provided for a 15 percent mark up on "the cost of electricity," which is a more ambiguous phrase.

R14-2-xxx5. Competitive Services

No change required.

R14-2-xxx6. Services Required To Be Made Available by Affected Utilities.

C.

Proposed Change

Change the introductory paragraph of R14-2-xxx6.C to read as follows:

C. *By the date indicated in Subsection R14-2-xxx2, each Affected Utility shall file Unbundled Service tariffs to provide separate, unbundled service tariffs for each of the services listed below, to all eligible purchasers on a non-discriminatory basis.*

G.

Proposed Change

Modify paragraph 2 to read as follows:

2. *Such rates shall reflect the actual costs of providing the services. Approval of rates and terms shall be subject to evidentiary hearings open to all affected parties.*

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Explanation of Proposed Change

Cost of providing service is an extremely important issue for consumers. The availability of customer participation in evidentiary hearings concerning determination of "costs of providing the services" will be essential for the process to be fair and accurate, and in allowing utility customers to have confidence in the results of the hearings.

R14-2-xxx7. Recovery of Stranded Investment of Affected Utilities.

D.

Proposed Change

Strike the words "exit fees."

Explanation of Proposed Change

The mechanism for potential recovery of stranded investment is adequately addressed in the reference to "distribution charges or other means" in R14-2-xxx7.D. Exit fees are anti-competitive in nature and should not be considered as a mandated mechanism for recovery of potential Stranded Investment. However, voluntary payment of exit fees *in lieu of* distribution charges or other means should be permitted for recovery of potential Stranded Investment. This option can be addressed later if and when the commission makes any further determinations regarding the recovery of stranded investment.

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E.

Proposed Change

Add, between subparagraphs R14-2-xxx7.E.4 and R14-2-xxx7.E.5, the following new subparagraph R14-2-xxx7.E.5, and renumber succeeding paragraphs accordingly:

- 5. *The degree to which a customer who participates in the competitive market had received firm, as opposed to non-firm, service from an Affected Utility prior to terminating generation supply service from that Affected Utility.*

Explanation of Proposed Change

The distinction between firm and non-firm service is important in determining the amount and fair allocation of Stranded Investment mechanisms and charges. The impact on an Affected Utility's potential Stranded Investment resulting from non-firm service customers choosing to buy from competitive suppliers may be different than the impact resulting from firm customers making the same choice.

F.

Proposed Change

Change R14-2-xxx7.F to provide as follows:

- F. *Stranded investment shall only be recovered from customer purchases made in the competitive market using the retail access provisions of this rule. Any reduction in electricity purchases from Affected Utilities which is a result of self-generation, demand-side management, or other similar demand reductions that are undertaken for any reason other than the retail access provisions of this rule, shall not be used to calculate or to recover any stranded investment from a customer.*

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Explanation of Proposed Change

Asarco, BHP and Cyprus support the policy inherent in R14-2-xxx7.F as originally drafted that, if stranded investment is to be recovered, it should be restricted to transactions which occur in the competitive market under provisions of the Rule. Asarco, BHP and Cyprus believe that the proposed change in R14-2-xxx7.F is necessary to clarify that the (potential) recovery of stranded investment is to be tied to competitive market *transactions* rather than to *customers* (per se) who participate in the competitive market, because many customers may choose a *combination* of supply options -- including utility purchases, self-generation, DSM, etc.-- of which competitive generation is but one component. Fairness and consistency require that only the *portion* of (utility) demand reduction involving retail access purchases should be subject to any stranded investment charge.

R14-2-xxx8. Systems Benefits Charges

A.

Proposed Change

Insert the words "pro-rata" after "...mechanisms to recover the..." in paragraph

R14-2-xxx8.A:

Explanation of Proposed Change

Clarifies that different System Benefits may be recovered from different customers in pro-rata amounts.

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1 **R14-2-xxx9. Solar Portfolio Standard**

2 **A. and B.**

3 Proposed Changes

4 Substitute a voluntary "green tariff" for the mandatory solar energy purchase
5 provisions of R14-2-xxx9.A. and B.

6 In the alternative, if the Commission decides to require mandatory purchases
7 of solar energy, change the percentage requirements of R14-2-xxx9.A. and R14-2-xxx9.B.
8 from one percent, beginning January 1, 1999, and two percent beginning January 1, 2002,
9 to 0.25% for all time periods.

10 Explanation of Proposed Change

11
12 The requirement that competitive suppliers obtain one percent of their energy
13 resources from solar resources in 1999 and two percent in 2001 will unduly burden the
14 competitive market. Asarco, BHP and Cyprus recommend that this feature be eliminated in
15 favor of a voluntary "green tariff" approach. At a minimum, the solar requirement should
16 be scaled back to a level which can be absorbed without causing an undue economic burden
17 or other obstacles to implementation of retail access.

18
19 With solar energy costing around 25 cents per kwh more than competitive
20 alternatives, a one percent requirement will add 2.5 mills per kwh to the price of competitive
21 power; a two percent requirement will add 5 mills. This latter requirement is more than eight
22 times the cost of the recent EEASE surcharge (at 0.57 mills/kwh) and even exceeds the
23 ceiling price of long-term firm wholesale transmission service on the APS system, based on
24 information filed with the FERC.

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Asarco, BHP and Cyprus believe that a "solar surcharge" which is greater than the cost of transmission service is excessive, even if subsidization of solar resources is determined to be appropriate public policy. Even with possible cost reductions associated with economies of scale and technological improvements, the solar surcharge which would result from the proposed requirements would absorb much of the savings from competition for many customers, unduly burdening the competitive market.

For purposes of comparison, Asarco, BHP and Cyprus note that requiring 0.25 percent of competitive generation service to come from new solar resources would be an approximately equivalent "surcharge burden" (in cents per kwh) to the full cost of the recent EEASE program. If the purchase of solar resources is to be mandated in a competitive market, the companies recommend that the parameters be designed such that the effective surcharge be no greater than that required by the recent EEASE surcharge, net of any EEASE-type program costs which may be included in the proposed Systems Benefit charge.

R14-2-xxx10. Pooling of Generation and Centralized Dispatch of Generation or Transmission

No change proposed.

R14-2-xxx11. In-State Reciprocity

No change proposed.

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R14-2-xxx12. Rates

E.

Proposed Change

Delete from R14-2-xxx12 the phrase "provided that the price is not less than the marginal cost of providing the service."

Explanation of Proposed Change

In a competitive market, there is no compelling rationale for prohibiting sales made below marginal cost.

R14-2-xxx13 through 15.

No change proposed.

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