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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF NET METERING IN
THE GENERIC INVESTIGATION OF
DISTRIBUTED GENERATION

Docket No. E-00000A-99-0431

COMMENTS OF ARIZONANS
FOR ELECTRIC CHOICE AND
COMPETITION CONCERNING
THE PROPOSED ORDER FOR
NET METERING IN THE
GENERIC INVESTIGATION OF
DISTRIBUTED GENERATION

Arizonans for Electric Choice and Competition ("AECC") hereby submits its comments concerning the proposed order for Net Metering in the Generic Investigation of Distributed Generation.

AECC supports adoption of the decision recommended by Staff, which would adopt the PURPA Standard on Net Metering and provide for a rulemaking process to draft rules for net metering.

Staff proposes that the rulemaking process addresses the following issues, at a minimum:

- Customer sector participation
- Types of generation resources
- Project size
- Total participation
- Metering
- Treatment of net excess generation
- Responsibility for costs

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AECC agrees with the issues identified in Staff's list, but would add the following:

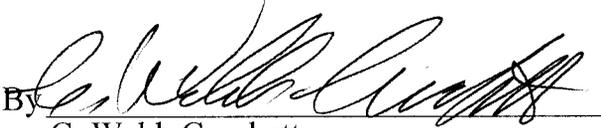
- Application/conformance of net metering to TOU rates.

AECC believes the latter issue is important to ensure that credit provided to customers for self-generation properly reflects the differences in value for energy provided during different hours of the day.

AECC also points out what appears to be a typographical error in Staff's recommended order: we believe that page 6, line 20, should refer to "Finding of Fact No. 5", not "Finding of Fact No. 4".

RESPECTFULLY SUBMITTED this th15 day of August, 2007.

FENNEMORE CRAIG, P.C.

By 

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this 15 day of August, 2007 to:

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Chief Administrative Law Judge
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