



# Deluge, Inc.



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AZ CORP COMMISSION  
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February 11, 2008

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Arizona Corporation Commission  
**DOCKETED**

FEB 12 2008

RE: Deluge, Inc. Comments for the Net Metering Rules  
Docket No. RE-00000A-07-0608

DOCKETED BY	<i>mn</i>
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Dear Madam or Sir:

Deluge, Inc. is providing comments on the Net Metering Rules proposed.

If you have questions, please call Brian Hageman at 602-431-0566

Sincerely,

Brian Hageman, CEO  
Deluge, Inc.

Net metering rules to be adopted are being provided to allow electric utility customers the ability for self-powering of typical electric needs associated with a home or small business. Demand side management tools such as net metering allow for greater flexibility in customer choice and further allows for anticipated deregulation of the electric utility industry. The proposed rule does not specify generator size limits, only that no more than 125% of peak expected demand be allowed.

It should be specified that if a customer has the desire to install a larger generator that may provide expanded use for future needs, that the utility allow for the expanded needs but only 125% of peak will be considered in billing, based on historical peak levels of electric use. The "peak" values should be allowed for adjustment if further electric consumption is anticipated, i.e. electric vehicle charging, increased use of air-conditioning, remodeling that would expand use, etc.

All net metering installations must follow applicable IEEE standards. The meters and disconnect devices shall be in accordance with IEEE standards and not be limited to utility devices. Customers must be allowed to upgrade to more sophisticated metering devices as state-of-the-art meters advance and not be limited by a utility.

Typical distributed interconnecting generators are required to shut down in the event of a grid failure. Net metered generators must isolate themselves for the grid during a grid failure but must also be allowed to continue use by the customer for self powering ability.

The definition of solar must include solar thermal as well as solar radiation. The sun produces two types of energy, radiation as in light that powers photovoltaics, and also solar heat, where the btu's transmitted can be harnessed and used in mechanical generation systems. (change - O. "Solar" means solar radiation.... to "Solar" means solar energy.....)