

ORIGINAL



OPEN MEETING AGENDA ITEM



0000099523

Leland R. Snook  
Director  
State Regulation & Pricing

Tel. 602-250-3730  
Fax 602-250-3003  
e-mail Leland.Snook@aps.com

Mail Station 9708  
PO Box 53999  
Phoenix, Arizona 85072-3999

Arizona Corporation Commission  
**DOCKETED**

June 17, 2009

JUN 17 2009

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

DOCKETED BY	<i>MS</i>
-------------	-----------

AZ CORP COMMISSION  
DOCKET CONTROL

2009 JUN 17 P 4:42

RECEIVED

RE: Arizona Public Service Company's Schedule EPR-6  
Comments and Proposed Amendment to the Recommend Order  
Docket No. E-01345A-09-0012

Arizona Public Service Company ("APS") submits the following comments and proposed amendment to the Recommended Order in the matter of the Company's application for approval of a net metering schedule EPR-6, which was submitted for Commission approval pursuant to Decision No. 70567.

Comments

APS does not oppose Staff's recommended changes to Schedule EPR-6 as reflected in the Recommended Order. Specifically, the Recommended Order requires that (1) language referring to future recovery of certain net metering costs be excluded from the rate schedule and that (2) the metering section of the rate schedule be modified to read:

Customers served under this rate schedule will require a bi-directional meter that will register and accumulate the net electrical requirements of the customer. The Company will install such a meter at the customer's Net Metering Facility if proper metering is not already present. The initial incremental metering costs for bidirectional metering and the facility meter will be incurred by the Company.

As stated, APS does not oppose either of these modifications to Schedule EPR-6.

Proposed Amendment

APS proposes an amendment to the Recommended Order, at the end of Finding of Fact No. 16, which would further modify the metering language proposed by Staff to allow some flexibility in the requirement for a bidirectional meter, in cases where the customer's renewable generator is small relative to their load. In such case, a bidirectional meter would not be necessary because there would never be any excess generation flowing back to the Company's grid and, therefore, no need to meter the "backward flow" of power. The Company believes that this modification would be beneficial because it could lower the cost of implementing the net metering program and it would allow customers with certain metering equipment, such as totalizing meters, for which bidirectional metering equipment is not available, to participate in net metering.

Accordingly, APS proposes that the metering language in Finding of Fact No. 16 of the Recommended Order be modified to read:

Customers served under this rate schedule will require a bi-directional meter that will register and accumulate the net electrical requirements of the customer. The Company will install such a meter at the customer's Net Metering Facility if proper metering is not already present. The initial incremental metering costs for bidirectional metering and the facility meter will be incurred by the Company. A bidirectional meter may not be required if the generating capacity of the Net Metering Facility is less than 10% of the customer's lowest billing demand over the previous 12 months, or as otherwise determined by the Company through available information; or if the customer agrees that they do not intend to net any Excess Generation on their monthly bill.

If you have any questions or concerns please contact Charles Miessner at (602) 250-3081.

Sincerely,

A handwritten signature in black ink that reads "Leland R. Snook". The signature is written in a cursive style with a large, prominent "L" and "S".

Leland R. Snook

LRS/tem

CC: Ernest Johnson  
Terri Ford  
Barbara Keene  
Steve Irvine