

E 01575A-08-0328
E 01575A-09-0453

OPEN MEETING AGENDA ITEM



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ORIGINAL

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

Investigator: Brad Morton

Phone:

Fax:

Priority: Respond Within Five Days

Opinion No. 2010 - 87480

Date: 6/18/2010

Complaint Description: 08A Rate Case Items - Opposed
N/A Not Applicable

Complaint By: First: David Last: Butler

Arizona Corporation Commission

DOCKETED

Account Name: Optimal Building Systems

Home: (000) 000-0000

JUN 18 2010

Street:

Work:

City: Sierra Vista

CBR:

DOCKETED BY

State: AZ Zip: 85635

is:

Utility Company: Sulphur Springs Valley Electric Cooperative, Inc.

Division: Electric

Contact Name: Contact Phone:

Nature of Complaint:

Docket No. E-01575A-08-0328

Without asserting a position on the ROO itself, I would like to point out a technical misunderstanding or misrepresentation regarding the use of energy storage on an electric distribution network. In the Interveners' Exception to the ROO docketed on June 10, as well as in previous filings, several alternatives to the 69kV line have been suggested, including a MW solar array combined with MW storage. In a grid-tied installation, it makes little sense to combine solar PV and storage technology when the problem is an over-capacity distribution feeder. This is a common misperception. Load profiles for the V7 feeder show it has far more capacity than is needed during much of the day. Indeed, this is the nature of power distribution. Storage capacity is essentially a load shifting technology -- the battery charges when loads are low and discharges when loads are high. If storage technology were determined to be a viable option, there is more than adequate power available on the feeder to charge the storage between peaks, without the need for additional energy from a PV array. Solar production offers other benefits, but does little to solve a distribution line capacity problem. In my opinion, this was a fundamental misunderstanding throughout the 69kV debate. I cannot speak to the cost of a storage-based solution but there's no doubt this technology alone could substantially reduce peak loading on the V7 line.

David Butler, President
Optimal Building Systems, LLC
Sierra Vista, Arizona
End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

Opinion Docketed.
End of Comments

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Date Completed: 6/18/2010

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