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BEFORE THE ARIZONA CORPORATION COMMISSION

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2010 AUG 30 A 11: 04

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- 8 BOB STUMP

AUG 26 2010

ARIZONA CORPORATION
DOCKET CONTROL

ARIZONA CORP. COMM
400 W CONGRESS STE 218 TUCSON AZ 85704

10 IN THE MATTER OF THE APPLICATION
 11 OF SULPHUR SPRINGS VALLEY
 12 ELECTRIC COOPERATIVE, INC. FOR A
 13 HEARING TO DETERMINE THE FAIR
 14 VALUE OF ITS PROPERTY FOR
 15 RATEMAKING PURPOSES, TO FIX A
 16 JUST AND REASONABLE RETURN
 17 THEREON, TO APPROVE RATES
 18 DESIGNED TO DEVELOP SUCH RETURN
 19 AND FOR RELATED APPROVALS.

DOCKET NO. E-01575A-08-0328

21 IN THE MATTER OF THE APPLICATION
 22 OF SULPHUR SPRINGS VALLEY
 23 ELECTRIC COOPERATIVE, INC. FOR AN
 24 ORDER INSTITUTING A MORATORIUM
 25 ON NEW CONNECTIONS TO THE V-7
 26 FEEDER LINE SERVING THE
 27 WHETSTONE, RAIN VALLEY, ELGIN,
 28 CANELO, SONOITA, AND PATAGONIA,
 29 ARIZONA AREAS.

DOCKET NO. E-01575A-09-0453

INTERVENORS' MOTION TO
REJECT SSVEC'S COMPLIANCE
FILING OF JULY 30, 2010
TO DECISION NO. 71794

INTRODUCTION AND BACKGROUND

34 On July 12, 2010, the Arizona Corporation Commission ("ACC") issued Decision
 35 No. 71794 which included the requirement that Sulphur Springs Valley Electric
 36 Cooperative ("SSVEC") file its Renewable Energy Standard Tariff Implementation plan
 37 as soon as possible, but in no case later than July 30,2010. Specifically the ACC
 38 ordered:

Arizona Corporation Commission

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1 seminars on renewable energy.” They go on to state in their filing that “this is a
2 powerful public relations tool” yet only use it **on occasion** for important topics such as
3 renewable energy. When was the last time SSVEC held a seminar on renewable
4 energy, when are the next ones planned? Where is the specificity in this filing on how
5 they will encourage and educate its members on the use of renewable energy and
6 demand side management practices? It is simply not here. Why, because there are no
7 plans. How are they evaluating the effectiveness of their programs? How are they
8 determining what their members need? What type of metrics are they collecting to
9 insure their members are receiving the support and information they need to make
10 informed decisions? It is a basic principle of Adaptive Management to evaluate a
11 program by monitoring its effectiveness and making the necessary alterations to reach
12 programmatic goals – but wait, SSVEC has no clearly stated programmatic goals for
13 renewable energy in the area served by the V-7 feeder. Why not?

14 **Member Magazine.** SSVEC states that less than 20% of its bi-monthly
15 magazine is dedicated to specific SSVEC issues. And some of those pages according
16 to their statement are announcements of “our annual meeting and the introduction of
17 newly elected directors to our board of directors”. SSVEC states that this magazine
18 usually features programs such as “our science fair or Washington Youth Tour.” How
19 are any of these features beneficial to cooperative members seeking ways to reduce
20 their electric bills or encouragement for those interested in renewable energy programs?
21 The answer is they are not.

22 SSVEC states in their compliance filing that Jay Lane of Jay Lane and
23 Associates, SSVEC’s grant writer, has already conducted a grant writing class for

1 SSVEC members in the V-7 Feeder Area which was funded by SSVEC. If SSVEC paid
2 for this they better get their money back. Mr. Lane did meet with several of the
3 business owners in Sonoita. It was a presentation of his professional work but when
4 cost was brought up, cost to the individual businesses, none of these businesses felt
5 that they could afford Mr. Lane's fees. These are businesses who are struggling to
6 survive in the current economic environment. None have any money to spend on hiring
7 grant writers for grants that may or may not be successful. So for SSVEC to suggest
8 that Mr. Lane "will continue to work with interested businesses and non profits in the V-7
9 area on grant funding availability" is totally off the mark. The only non-profit we know
10 that Mr. Lane is working with is National Audubon Society and this is only to facilitate
11 receipt of a portion of the rebate that is owed to the Society, not new funding for this
12 non-profit.

13 Where in SSVEC's compliance filing is any mention of their plans for Time of
14 Use, Net Metering, Demand Side Management Programs, replacement of electric
15 heaters (water or air) as stated in Navigant's Feasibility Study, or information on smart
16 meters? The answer is nowhere! Once again, SSVEC is putting a "spin" on
17 compliance. They have provided long lists of old documents but no specifics as to what
18 they plan to do in the future.

19 Finally, as Intervenors in Docket No. E-01575A-08-0328 and Docket No. E-
20 01575A-09-0435 we were surprised that we were not extended the courtesy of receiving
21 a copy of SSVEC's July 30,2010 filing.

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1 **Recommendation and Conclusion**

2 SSVEC has once again, as they have done in the past, fulfilled the requirement
3 of filing a document by its due date. Have they included any details as required by the
4 ACC? No. This is a slap in the face to all who hold this company accountable for its
5 actions. All we ask is that SSVEC do what is required of it, not just give lip service to
6 ACC orders.

7 We urge the ACC to reject this document. It is not in compliance with Decision
8 No. 71794, it has no specific plans and it does not spell out what it will do in the area
9 serviced by the V-7 feeder area. The cooperative members deserve more than this.

10 Respectfully submitted on this 26th day of August 2010.

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