

ORIGINAL



0000120341

BEFORE THE ARIZONA CORPORATIC...

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**COMMISSIONERS**

KRISTIN K. MAYES - CHAIRMAN  
GARY PIERCE  
PAUL NEWMAN  
SANDRA D. KENNEDY  
BOB STUMP

Arizona Corporation Commission

**DOCKETED**

NOV 30 2010

DOCKETED BY

IN THE MATTER OF THE TRICO ELECTRIC )  
COOPERATIVE, INC.'S APPLICATION FOR )  
APPROVAL OF A NET METERING TARIFF. )  
)  
)  
)  
)  
)

DOCKET NO. E-01461A-09-0450

**NOTICE OF FILING**

Trico Electric Cooperative, Inc. hereby files the Reply Testimony of Karen Cathers in the above-mentioned docket.

RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of November, 2010.

**ROSHKA DEWULF & PATTEN, PLC**

By   
Michael W. Patten  
Jason D. Gellman  
One Arizona Center  
400 East Van Buren Street, Suite 800  
Phoenix, Arizona 85004

Attorneys for Trico Electric Cooperative, Inc.

AZ CORP COMMISSION  
DOCKET CONTROL

2010 NOV 30 P 3:52

**RECEIVED**

**ROSHKA DEWULF & PATTEN, PLC**  
ONE ARIZONA CENTER  
400 EAST VAN BUREN STREET - SUITE 800  
PHOENIX, ARIZONA 85004  
TELEPHONE NO 602-256-6100  
FACSIMILE 602-256-6800

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

Original and 13 copies of the foregoing  
filed this 30<sup>th</sup> day of November, 2010 with:

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

Copy of the foregoing hand-delivered/mailed  
this 30<sup>th</sup> day of November, 2010 to:

Lyn Farmer, Esq.  
Chief Administrative Law Judge  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Janice M. Alward, Esq.  
Chief Counsel, Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Steve Olea  
Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

James Arkoosh  
65227 East Emerald Ridge Dr  
Tucson, Arizona 84739

By 

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**COMMISSIONERS**

KRISTIN K. MAYES CHAIRMAN  
GARY PIERCE  
PAUL NEWMAN  
SANDRA D. KENNEDY  
BOB STUMP

IN THE MATTER OF THE TRICO ELECTRIC ) DOCKET NO. E-01461A-09-0450  
COOPERATIVE, INC.'S APPLICATION FOR )  
APPROVAL OF A NET METERING TARIFF. )  
\_\_\_\_\_ )

Reply Testimony of

Karen Cathers

on Behalf of

Trico Electric Cooperative, Inc.

November 30, 2010

1 **Q. Please state your name and business address.**

2 A. My name is Karen Cathers and my business address is 8600 West Tangerine Road,  
3 Marana, Arizona, 85658

4

5 **Q. Did you previously provide direct testimony in this docket on behalf of Trico**  
6 **Electric Cooperative, Inc. (“Trico” or the “Company”)?**

7 A. Yes.

8

9 **Q. What is the purpose of your reply testimony?**

10 A. I am responding to the Direct Testimony of Barbara Keene that was filed on behalf of  
11 Commission and to the comments submitted by Mr. Arkoosh. Trico agrees with Ms.  
12 Keene’s analysis of the issues in this docket and Trico continues to believe it has fully  
13 supported its net metering administrative costs in accordance with the Net Metering rules.  
14 I believe Mr. Arkoosh misinterprets what constitutes a “cost study” to support the net  
15 metering tariff and simply disagrees with the need for a SmartSynch meter capable of  
16 timely bidirectional data monitoring.

17

18 **Q. Please comment on the Direct Testimony of Ms. Keene.**

19 A. I agree with her conclusion that Trico’s net metering administrative charge of \$3.38 per  
20 month is reasonable, cost-based and in compliance with the Commission’s Net Metering  
21 rules. The Commission is entitled to interpret its own rules and Ms. Keene confirms that  
22 the information provided by Trico regarding the administrative charge provided sufficient  
23 cost-based information under the Net Metering rules for the administrative charge.

24

25 Ms. Keene also confirms that net metering is a vastly different service than standard rate  
26 metering. It also appears that Staff agrees that the administrative charge actually could  
27 be higher than the \$3.38 requested by Trico.

1 Finally, I agree with Ms. Keene that no evidentiary hearing is necessary. Commission  
2 Staff has indicated that it has the necessary cost information required by Rule 2305 under  
3 its interpretation of the Net Metering rules.  
4

5 **Q. Please comment on Mr. Arkoosh's comments.**

6 A. Mr. Arkoosh appears to take issue with the format of the cost information and with the 15  
7 minute interval readings provided by the SmartSynch meters. First, Commission Staff  
8 believes that Trico has provided cost information that meets the requirements of the  
9 Commission's rules. There is no requirement for a formal third-party cost study as  
10 suggested by Mr. Arkoosh.  
11

12 Second, as I noted in my Direct Testimony, Trico's net metering technology allows the  
13 meter to measure energy flow both to the customer and from the customer on a 15 minute  
14 interval basis to provide the information necessary for an effective net metering program.  
15 The \$5.00 per month charge for a residential net metering account has a higher fee than  
16 standard meter reading because it collects the data for *both* directions of flow -- to and  
17 from the customer. Fifteen minute interval data is an industry standard for such  
18 technology. Setting uniform meter reading parameters is the most efficient and cost  
19 effective approach. Moreover, the interval data is critical if there are any questions or  
20 disputes about the result of net metering and the amounts owed under the Commission-  
21 approved Net Metering tariff. Monthly meter readings are insufficient for such  
22 monitoring.  
23

24 Mr. Arkoosh apparently does not want to pay for the improved metering necessary for  
25 him to enjoy the full benefits of his rooftop solar system. However, this technology is  
26 necessary for Trico to allow him to do so.  
27

1 **Q. Mr. Arkoosh asserts that you could read 30 net metering meters for \$38.31. Do you**  
2 **agree?**

3 A. No. First, that position assumes that monthly readings would be sufficient, which they  
4 are not for net metering. Second, it relies on unsubstantiated assumptions about the  
5 location of SmartSynch meters and assumes there is zero travel and meter reading time  
6 for each meter after the first meter, which is simply not possible. Third, even monthly  
7 remote reading for our standard meters results in a cost of \$1.62 per month using our  
8 legacy power line carrier system. As I explained in my direct testimony, that system does  
9 not provide the two-way meter interval reads that we receive from the SmartSynch  
10 meters. To install a similar automated power line carrier system for SmartSynch meters  
11 would require a significant capital expense and would not be cost effective compared to  
12 the wireless meter reading, given the relatively small number of SmartSynch meters.

13  
14 **Q. Does this conclude your reply testimony?**

15 A. Yes, it does.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27