

ORIGINAL
OPEN MEETING



MEMORANDUM
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Arizona Corporation Commission
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TO: THE COMMISSION

FROM: Utilities Division

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

DATE: December 23, 2010

DOCKETED BY

RE: MOHAVE ELECTRIC COOPERATIVE, INC. - APPLICATION FOR APPROVAL OF ITS 2011 RENEWABLE ENERGY STANDARD AND TARIFF PLAN AND TARIFF (DOCKET NO. E-01750A-10-0264)

Background

On July 1, 2010, Mohave Electric Cooperative, Inc. ("MEC", or "Mohave") filed an application for approval of its 2011 Implementation Plan pursuant to the Renewable Energy Standard and Tariff ("REST") Rules. On November 3, 2010, MEC filed an amendment to the proposed plan.

MEC's Implementation Plan

Commission Decision No. 71407, dated December 8, 2009, approved MEC's Plan for 2010. The 2011 REST Plan maintains the significant features of its 2010 REST Plan and would also:

- a) Add participation in a geothermal project near Willcox, Arizona;
- b) Add more flexibility to the Habitat for Humanity program;
- c) Increase the maximum dollar rebate for commercial systems from \$30,000 to \$50,000;
- d) Provide internal bridge financing for the Solar for Schools program; and
- e) Integrate the statewide solar website program with MEC's existing website.

With this Application, MEC seeks no changes in the REST surcharge.

Willcox Geothermal. MEC has entered into an agreement with Sulphur Springs Valley Electric Cooperative and Arizona Electric Power Cooperative ("AEPSCO") to implement a geothermal project in the Wilcox area. The project became operational in November 2009 and is expected to provide approximately 47 kW to MEC.

Habitat for Humanity. MEC has partnered with Habitat for Humanity to offer alternative energy options to low income housing in MEC's service area. MEC's REST Plan budget allows for one project per year not to exceed \$25,000. In years where Habitat for Humanity does not designate an eligible low income housing project under this program by July 1 of the year, MEC

would select another community-based non-profit organization to receive the \$25,000 renewable energy project.

MEC partnered with the Bullhead City Habitat for Humanity and installed a 3.5 kW photovoltaic ("PV") array on the area's first Habitat for Humanity house completed in late 2009. Habitat for Humanity decided not to construct a home in MEC's service area in 2010, so MEC partnered with the Boys and Girls Club to install a \$25,000 renewable energy system.

Maximum Rebates. The Sun Watts Incentive Program pays incentives to residential and commercial customers to install solar or wind facilities. With its amendment to the original application, MEC proposes to pay \$2.00 per installed watt up to 40 percent of the system total cost for systems up to 5 kW for residential and 10 kW for commercial. For larger systems, up to 50 kW, MEC would pay \$1.50 (reduced from the current \$2.00) per watt up to 40 percent of the system total cost. The 40 percent cap is reduced from the 45 percent as approved in Commission Decision No. 71955 (November 1, 2010).

Other restrictions. Mohave includes a dollar cap for residential PV and small wind systems installed at a single residence of \$30,000 and proposes to increase the cap from \$30,000 to \$50,000 for commercial PV and wind turbine systems installed at a commercial location. Also, the combined generation capacity at the location is limited to a maximum of 125 percent of the total connected load at the location and one installation per service entrance for residential and commercial PV and small wind turbine systems. These restrictions are unchanged from MEC's 2010 Implementation Plan as approved by the Commission.

Solar Water Heating Systems. For systems replacing a traditional electric water heater, MEC will pay \$0.75 per kWh of energy saved during the first year. This is unchanged from the previously approved MEC REST plan.

Sun Watts Large Scale Program. MEC can partner with AEPSCO to secure renewable resources via purchased power contracts or through construction of utility-sized facilities. AEPSCO has issued an RFP to secure third-party providers of renewable resources. MEC will participate with AEPSCO installing resources using previously collected environmental surcharge funds deposited with AEPSCO.

Geothermal Resources. MEC, in partnership with Navopache Electric Cooperative ("Navopache"), retained Black & Veatch to conduct a feasibility study with respect to geothermal resources in their service territories. This study indicates that within the immediate vicinity of the Mohave service territory, there is a conventional hydrothermal resource with modest potential for geothermal power development. There is also hydrothermal potential within the Navopache service territory to initially develop something on the order of 5 MW of power. Navopache has initiated a grant application to the Department of Energy to fund exploratory drilling. Mohave would partner with Navopache in the commercial development.

5 MW Solar. The facility located within the MEC load pocket is being developed for Mohave as a lease/buy arrangement. The project will be connected to the distribution system for the benefit of the members/owners. The present Commission REST rules define DG and

Distributed Renewable Energy Resources ("DE") as being located on a customer's premises. The 5 MW Solar facility is not sited on customer premises. Mohave states that the benefits of DG are achieved with its solar facility, and in a more cost-effective manner than many smaller systems totaling 5,000 kW. Mohave views DG in the traditional utility engineering sense of being generation facilities connected directly to the distribution system rather than at a remote power plant connected with transmission lines. Mohave requested in its 2010 REST Plan that the Commission consider that its 5 MW system meets the intent of the rules and counts towards the DE requirements specified in R14-2-1805. Mohave would consider the Solar facility as meeting the residential/non-residential DE requirement by classifying the project output as residential and non-residential according to its customer class residential/non-residential breakdown.

Staff had previously recommended that the 5 MW Solar facility count toward meeting the REST Rule Renewable Energy Resources requirement but not count toward meeting the Distributed Renewable Energy Resources requirement. Decision No. 71407 ordered that the 5 MW Solar system would count toward meeting the REST Rule Renewable Energy Resources requirement but that no determination would be made at that time regarding it meeting the Distributed Renewable Energy Resources requirement. MEC requests similar treatment at this time, with a final determination to be based on the actual contractual documents and project details that MEC will submit to the Commission when available. Staff recommends that the Commission continue to defer the determination.

Another proposal related to the 5 MW project proposed in the Amendment is to expand the authorized use of REST funds allocated for the 5 MW solar project for use on any qualified renewable project of 2 MW or larger.

Schools Program. This will award a PV system to one school each year at no cost to the school and not to exceed \$50,000. Based on present PV costs, a 5 to 8 kW system could be installed. In addition, one school per year would be offered up to \$5,000 in educational grants to develop renewable energy curricula.

Bridge Financing. MEC had expected to install PV systems on ten schools in 2010, at a total cost of \$500,000. MEC has been unable to secure state or federal funding such as Clean Renewable Energy Bonds ("CREB") for these PV systems, and desires to proceed with the schools' PV facilities. MEC therefore seeks authorization to use \$500,000 of internal funding as a bridge loan to be repaid with REST funds over ten years at the CREB rate.

Advertising, Promotion, and Administration. MEC uses bill inserts, monthly newsletters, television, radio, and community events to advertise and promote its REST programs. Unused funds are carried over to the next year.

Progress. MEC has 118 residential and small commercial PV arrays installed within its service territory. These facilities range in size from 2 to 20 kW with a total of 449 kW and an annual energy production of 984,171 kWh.

MEC also has 29 small wind generators installed within its service territory. The wind generators are all rated at 2 kW and have an annual production of 101,389 kWh. All of these member-owned wind and PV systems were installed prior to January 2010 when MEC participated in the AEPCO REST plan.

Budget

MEC has proposed the budget shown below in Table 1. The proposal for 2010 is a decrease of about 11 percent over the present REST budget (from \$1.7 million to \$1.5 million).

Table 1
Mohave Electric Cooperative
Renewable Energy Resources Budget
Five-Year Forecast

| | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2014</u> | <u>2015</u> |
|----------------------|---------------------|-------------|-------------|-------------|-------------|
| Resources | Expenditures | | | | |
| Res & Comm Incentive | \$531,645 | \$554,369 | \$505,236 | \$520,750 | \$536,419 |
| 5 MW Solar DG | \$548,884 | \$548,884 | \$548,884 | \$548,884 | \$548,884 |
| Solar Water Heating | \$9,000 | \$18,000 | \$18,000 | \$18,000 | \$18,000 |
| Schools PV Loan Pmt | \$64,493 | \$64,493 | \$128,986 | \$128,986 | \$128,986 |
| Solar Website | \$3,488 | \$1,744 | \$1,744 | \$1,744 | \$1,744 |
| Willcox Geothermal | \$44,316 | \$29,544 | \$29,544 | \$29,544 | \$29,544 |
| Admin, Advertise | \$244,000 | \$244,000 | \$244,000 | \$244,000 | \$244,000 |
| Other Programs | \$75,000 | \$75,000 | \$75,000 | \$75,000 | \$75,000 |
| Total | \$1,520,826 | \$1,536,034 | \$1,551,394 | \$1,566,908 | \$1,582,577 |

Funding and Surcharge

Staff has reviewed MEC's proposed Renewable Energy Standard Tariff which sets forth the surcharge rates and monthly maximums to be collected to fund its annual budget for 2011. Proposed rates are unchanged from 2010 and are shown in Table 2. Expected revenue from customer classes is shown in Table 3.

Table 2
Mohave Electric Cooperative
Proposed 2011 RES Tariff Rates

| Customer Class | Energy Charge (per kWh) | Monthly Cap |
|-----------------------|------------------------------------|--------------------|
| Governmental | \$0.000942 | \$15.00 |
| Gov or Ag \geq 3MW | \$0.000942 | \$49.00 |
| Residential | \$0.0095006 | \$3.10 |
| Highway | \$0.0095006 | \$3.10 |
| Irrigation | \$0.0053714 | \$49.00 |
| Small Commercial | \$0.0053714 | \$49.00 |
| Large Power | \$0.0053714 | \$49.00 |
| Non-Res \geq 3MW | \$0.0053714 | \$147.00 |

Table 3
Mohave Electric Cooperative
Proposed 2011 REST Revenue

| Class | Revenue |
|------------------------|----------------|
| Residential | \$1,058,905 |
| Governmental | \$20,340 |
| Small Commercial | \$391,013 |
| Large Power | \$48,733 |
| Large Power \geq 3MW | \$1,764 |
| Highway | \$70 |
| Total | \$1,520,825 |

Fair Value Determination

Staff has analyzed Mohave's application in terms of fair value implications. The proposed tariff would have minimal or no impact on the MEC's revenue, fair value rate base, or rate of return. Because plant developed pursuant to the REST programs is not added to the rate base, there would be no corresponding effect on Mohave's ultimate revenue or rate of return.

Recommendations

Staff recommends that Mohave's proposed 2011 REST implementation plan be approved as discussed herein.

Staff recommends that the 5 MW Solar system should count toward meeting the REST Rule Renewable Energy Resources requirement but that no determination should be made at this time regarding it meeting the Distributed Renewable Energy Resources requirement.

Staff recommends that Mohave's Renewable Energy Standard Tariff remain at the current levels as shown in Table 2 herein.

Staff recommends that MEC file in Docket Control a Renewable Energy Standard Tariff consistent with the Decision in this case within 15 days of the effective date of the Decision.



Steven M. Olea
Director
Utilities Division

SMO:JJP:lh\RM

ORIGINATOR: Jeffrey Pasquinelli

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BEFORE THE ARIZONA CORPORATION COMMISSION

KRISTIN K. MAYES
Chairman

GARY PIERCE
Commissioner

PAUL NEWMAN
Commissioner

SANDRA D. KENNEDY
Commissioner

BOB STUMP
Commissioner

IN THE MATTER OF MOHAVE ELECTRIC)
COOPERATIVE, INC. – APPLICATION)
FOR APPROVAL OF ITS 2011)
RENEWABLE ENERGY STANDARD AND)
TARIFF PLAN AND TARIFF)

DOCKET NO. E-01750A-10-0264
DECISION NO. _____
ORDER

Open Meeting
January 11 and 12, 2011
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On July 1, 2010, Mohave Electric Cooperative, Inc. (“MEC”, or “Mohave”) filed an application for approval of its 2011 Implementation Plan pursuant to the Renewable Energy Standard and Tariff (“REST”) Rules. On November 3, 2010, MEC filed an amendment to the proposed plan.

MEC’s Implementation Plan

2. Commission Decision No. 71407, dated December 8, 2009, approved MEC’s Plan for 2010. The 2011 REST Plan maintains the significant features of its 2010 REST Plan and would also:

- a) Add participation in a geothermal project near Willcox, Arizona;
- b) Add more flexibility to the Habitat for Humanity program;
- c) Increase the maximum dollar rebate for commercial systems from \$30,000 to \$50,000;

1 d) Provide internal bridge financing for the Solar for Schools program; and

2 e) Integrate the statewide solar website program with MEC's existing website.

3 3. With this Application, MEC seeks no changes to the REST surcharge.

4 4. Willcox Geothermal. MEC has entered into an agreement with Sulphur Springs
5 Valley Electric Cooperative and Arizona Electric Power Cooperative ("AEPSCO") to implement a
6 geothermal project in the Wilcox area. The project became operational in November 2009 and is
7 expected to provide approximately 47 kW to MEC.

8 5. Habitat for Humanity. MEC has partnered with Habitat for Humanity to offer
9 alternative energy options to low income housing in MEC's service area. MEC's REST Plan
10 budget allows for one project per year not to exceed \$25,000. In years where Habitat for
11 Humanity does not designate an eligible low income housing project under this program by July 1
12 of the year, MEC would select another community-based non-profit organization to receive the
13 \$25,000 renewable energy project.

14 6. MEC partnered with the Bullhead City Habitat for Humanity and installed a 3.5 kW
15 photovoltaic ("PV") array on the area's first Habitat for Humanity house completed in late 2009.
16 Habitat for Humanity decided not to construct a home in MEC's service area in 2010, so MEC
17 partnered with the Boys and Girls Club to install a \$25,000 renewable energy system.

18 7. Maximum Rebates. The Sun Watts Incentive Program pays incentives to
19 residential and commercial customers to install solar or wind facilities. With its amendment to the
20 original application, MEC proposes to pay \$2.00 per installed watt up to 40 percent of the system
21 total cost for systems up to 5 kW for residential and 10 kW for commercial. For larger systems, up
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23 system total cost. The 40 percent cap is reduced from the 45 percent as approved in Commission
24 Decision No. 71955 (November 1, 2010).

25 8. Other restrictions. Mohave includes a dollar cap for residential PV and small wind
26 systems installed at a single residence of \$30,000 and proposes to increase the cap from \$30,000 to
27 \$50,000 for commercial PV and wind turbine systems installed at a commercial location. Also, the
28 combined generation capacity at the location is limited to a maximum of 125 percent of the total

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2 commercial PV and small wind turbine systems. These restrictions are unchanged from MEC's
3 2010 Implementation Plan as approved by the Commission.

4 9. Solar Water Heating Systems. For systems replacing a traditional electric water
5 heater, MEC will pay \$0.75 per kWh of energy saved during the first year. This is unchanged
6 from the previously approved MEC REST plan.

7 10. Sun Watts Large Scale Program. MEC can partner with AEPCO to secure
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9 facilities. AEPCO has issued an RFP to secure third-party providers of renewable resources.
10 MEC will participate with AEPCO installing resources using previously collected environmental
11 surcharge funds deposited with AEPCO.

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13 ("Navopache"), retained Black & Veatch to conduct a feasibility study with respect to geothermal
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15 Mohave service territory, there is a conventional hydrothermal resource with modest potential for
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17 service territory to initially develop something on the order of 5 MW of power. Navopache has
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7 the Distributed Renewable Energy Resources requirement. Decision No. 71407 ordered that the 5
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15 expand the authorized use of REST funds allocated for the 5 MW solar project for use on any
16 qualified renewable project of 2 MW or larger.

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26 17. Advertising, Promotion, and Administration. MEC uses bill inserts, monthly
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28 Unused funds are carried over to the next year.

1 18. Progress. MEC has 118 residential and small commercial PV arrays installed
 2 within its service territory. These facilities range in size from 2 to 20 kW with a total of 449 kW
 3 and an annual energy production of 984,171 kWh. MEC also has 29 small wind generators
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 5 production of 101,389 kWh. All of these member-owned wind and PV systems were installed
 6 prior to January 2010 when MEC participated in the AEP CO REST plan.

7 **Budget**

8 19. MEC has proposed the budget shown below in Table 1. The proposal for 2011 is a
 9 decrease of about 11 percent over the present REST budget (from \$1.7 million to \$1.5 million).

10 **Table 1**
 11 **Mohave Electric Cooperative**
 12 **Renewable Energy Resources Budget**
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22 **Funding and Surcharge**

23 20. Staff has reviewed MEC's proposed Renewable Energy Standard Tariff which sets
 24 forth the surcharge rates and monthly maximums to be collected to fund its annual budget for
 25 2011. Proposed rates are unchanged from 2010 and are shown in Table 2. Expected revenue from
 26 customer classes is shown in Table 3.

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| Large Power \geq 3MW | \$1,764 |
| Highway | \$70 |
| Total | \$1,520,825 |

Fair Value Determination

21. Staff has analyzed Mohave's application in terms of fair value implications. The proposed tariff would have minimal or no impact on the MEC's revenue, fair value rate base, or rate of return. Because plant developed pursuant to the REST programs is not added to the rate base, there would be no corresponding effect on Mohave's ultimate revenue or rate of return.

Recommendations

22. Staff has recommended that Mohave's proposed 2011 REST implementation plan be approved as discussed herein.

1 IT IS FURTHER ORDERED that MEC file in Docket Control a Renewable Energy
 2 Standard Tariff consistent with the Decision in this case within 15 days of the effective date of the
 3 Decision.

4 IT IS FURTHER ORDERED that this Decision become effective immediately.

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BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

| | |
|--------------|--------------|
| CHAIRMAN | COMMISSIONER |
| COMMISSIONER | COMMISSIONER |
| | COMMISSIONER |

IN WITNESS WHEREOF, I, ERNEST G. JOHNSON,
 Executive Director of the Arizona Corporation Commission,
 have hereunto, set my hand and caused the official seal of
 this Commission to be affixed at the Capitol, in the City of
 Phoenix, this _____ day of _____, 2011.

 ERNEST G. JOHNSON
 EXECUTIVE DIRECTOR

DISSENT: _____

DISSENT: _____

SMO:JJP:lh\RM

1 SERVICE LIST FOR: Mohave Electric Cooperative, Inc.
2 DOCKET NO. E-01750A-10-0264

3 Mr. Michael Curtis
4 Mr. William Sullivan
5 Curtis, Goodwin, Sullivan,
6 Udall & Schwab, P.L.C.
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9 Mr. Tyler Carlson
10 Ms. Peggy Gillman
11 Mohave Electric Cooperative
12 Post Office Box 1045
13 Bullhead City, Arizona 86430

14 Mr. Steven M. Olea
15 Director, Utilities Division
16 Arizona Corporation Commission
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19 Ms. Janice M. Alward
20 Chief Counsel, Legal Division
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