

EXCEPTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN
Commissioner-Chairman

RENZ D. JENNINGS
Commissioner

CARL J. KUNASEK
Commissioner

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IN THE MATTER OF THE COMPETITION) DOCKET NO. RE-00000-94-0165
IN THE PROVISIONS OF ELECTRIC)
SERVICES THROUGHOUT THE STATE) NOTICE OF FILING COMMENTS
OF ARIZONA)

Navopache Electric Cooperative, Inc. hereby gives notice of its filing of the original and ten (10) copies with Docket Control of the attached Comments on Staff's Proposed Changes to the Arizona Corporation Commission's Rule on Retail Electric Competition (R14-2-1601 et. seq.) dated July 24, 1998, and service thereof.

RESPECTFULLY SUBMITTED this 31st day of July, 1998.

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Arizona Corporation Commission
DOCKETED

JUL 31 1998

DOCKETED BY [Signature]

1 Navopache Electric Cooperative, Inc.
2 Comments on Staff's Proposed Changes to
3 the Arizona Corporation Commission's Rule on
4 Retail Electric Competition (version of July 24, 1998)

5 R14-2-210(A)(5)(b)

6 This change continues with a problem which Navopache has
7 commented on previously. The rule requires that a utility may
8 not render a bill based on estimated usage if the bill would be
9 the customer's first or final bill for service. Experience in
10 California indicates that getting out first bills is difficult
11 and estimated bills may be necessary. If an estimated bill
12 cannot be rendered, customers may have to wait several billing
13 cycles before a bill can be rendered. At that time the bill
14 could be quite large because it will cover several months'
15 usage.

16 The California experience is summarized in The Electricity Daily
17 of May 19, 1998. New suppliers were unable to render first
18 bills because of problems with billing software and because data
19 from utilities must be meshed with new billing systems.

20 Navopache strongly recommends that the prohibition on estimated
21 first bills be eliminated. Otherwise, customers will have
22 unpleasant surprises when their first bill is for several months
23 of usage. Navopache fears that the Commission's competition
24 policy may be blamed for bill shocks.
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