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Telephone: 480-484-6120
FAX: 480-484-6293
Web site: www.susd.org

EDUCATION CENTER
Office of the Superintendent
3811 North 44th Street
Phoenix, Arizona 85018-5420

AZ CORP COMMISSION
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January 21, 2013

Bob Stump, Chairman
Commissioner Gary Pierce
Commissioner Brenda Burns
Commissioner Bob Burns
Commissioner Susan Bitter-Smith
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Chairman, Commissioners:

We, the undersigned, would like to encourage the Commission to look into the changes that APS' new E-32L rate schedule makes to the rates of large commercial customers such as schools that have installed solar and to look into addressing the impacts of this new rate schedule on energy bill savings from solar.

Many schools have installed solar under APS' Schools and Government program in order to mitigate their energy bill costs. Up until now, the program has been incredibly effective at inciting schools to 'go solar' and in saving schools money that they can then put toward other uses. However, under the new E32-L rate schedule (a schedule that many schools are on) implemented during APS' most recent rate case, schools with solar are now paying more on their electricity bills than they would have otherwise. This is a result of the new rate increasing fixed charges while decreasing variable charges. This new rate will also limit the ability of non-solar schools to participate in the solar program in the future because the increase in fixed costs makes it more difficult to save money with solar installations.

We therefore encourage the Commission to work to find a solution that will allow schools that have already installed solar, as well as schools that are thinking of doing so, to fully take advantage of the savings normally associated with solar installations. Any solution deemed adequate by the Commission should be placed in effect until APS' next rate case in order to allow schools to ensure that they will continue to recoup a savings from their investment in solar infrastructure. The overall result should be the reinstatement of a rate that allows schools to continue to capture the financial benefits provided by their solar installations.

We thank the Commission for their attention to this critical matter.

Sincerely,

David J. Peterson, Ed.D., J.D.
Superintendent

Arizona Corporation Commission
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