

E-01933A-13-0224

ORIGINAL



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ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM

Investigator: Tom Davis

2013 AUG 22 A 11: 04

Priority: Respond Within Five Days

Opinion No. 2013 - 112363 Date: 8/20/2013

Complaint Description: 08A Rate Case Items - Opposed
N/A Not Applicable

Complaint By: First: Charles R. Last: Dunn

Account Name: Charles R. Dunn

Street: Work: (000) 000-0000

City: Tucson

State: AZ Zip: 85718 is: Cellular

Utility Company: Tucson Electric Power Company

Division: Electric

Contact Name:

Nature of Complaint:

OPPOSED

E-01933A-13-0224

ELECTRIC

Arizona Corporation Commission
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Please consider these recommendations and observations and vote no on ACC TEP 2014 REST Plan docket e-01933A-13-0224:

1) Increasing the TEP avoided cost valuation (MCCCG) for PV to reflect lifetime costs of those assets relative to the constantly increasing costs of TEP's current generation mix (TEP's considers only near term costs).

Also please include the 10 to 50 times greater than current water source costs that would be avoided by PV vs. TEP's present generation technology, that the ACC will eventually add to my water rate, as you did to my electricity rate to pay for the Environmental Compliance Adjuster surcharge (\$350M) and consider the 3/4 gallon/kWh lost to evaporation by TEP generation using steam; at TEP sales, about 7.5B gallons/year.

Considering the imminent water shortage crises, it's irresponsible of you to not take action to mitigate the impact by reducing Electric utilities use of potable water.

2) Eliminate and reallocate to Customer DG and Energy Efficiency program the PV PBI, about 4c/kwh, that TEP has requested to support their REST generation requirement. Commercial and Residential Customers can establish PV kWh generation with 1/2 (2c/kWh) that amount of RES funds.

3) Deny any RES funds for Utility/Shareholder owned RE generation facilities. DG Ratepayers receive none, it's inappropriate to subsidize shareholder assets and share values.

4) Require that Utilities include local manufacturing of RE facility components and provision of economical storage solutions in their bids for REST facilities.

We need 'storage' to reduce line balancing complexities & improve reliability (avoid brown/black outs); reduce base coal plant rate, emissions and need for the ECA; eliminate the need for expensive peakers, TOU/Demand

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charges; store more solar energy for use at night, and eliminate the need to sell 21% of the system generation of electricity at less than cost(4c/kWh), 1/3rd that charged to residential ratepayers, to Mines.

Local solar electric generation with storage would eliminate/reduce the need for the more than \$1B of TEP PPFAC, ECA, TOU/Demand surcharges to subsidize the shortcomings of fossil fueled generation, now authorized by ACC; those funds can be reallocated/used to establish local utility scale solar/storage, reduced each year as improvements made, eventually phased out over 5-years or so.

5) Please consider adopting ACC Aggregated Net Metering docket 10-0202 to allow Governments and School Districts to use land remote from their loads to generate PV kWh and credit to their urban meters; they can generate at much lower cost than the Utilities, require no funding from the RES as TEP does, and would allow them to control costs and my taxes, incite local manufacturing(increased utility electricity sales), storage development, higher wage jobs, population growth(higher utility electricity sales)and tax revenues.

End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

8/20/13: Entered for the record and docketed

CLOSED

End of Comments

Date Completed: 8/20/2013

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