

E-01345A-13-0248



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OPEN MEETING AGENDA ITEM
ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM

ORIGINAL

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Investigator: Richard Martinez

Phone:

2013 OCT 23 P 1:47

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Priority: Respond Within Five Days

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

Opinion No. 2013 - 113394

Date: 10/22/2013

Complaint Description: 19Y Net Metering
08A Rate Case Items - Opposed

Complaint By: First: Richard Last: McMains

Account Name: Richard McMains

Home:

Street:

Work:

City: Sierra Vista

CBR:

State: AZ Zip: 85650

is: E-Mail

Utility Company: Arizona Public Service Company

Division: Electric

Contact Name: For assignment

Contact Phone:

Nature of Complaint:

Docket No: E-01345A-13-0248

Name: Richard McMains

Date: 21 October 2013

Address:

Phone:

CityStateZip

Cell:

Docket:

DocketNo: E-01345A-13-0248

Utility: Sulphur Springs Valley Electric Cooperative, Inc.

Email

Arizona Corporation Commission

DOCKETED

OCT 23 2013

DOCKETED BY

Comments:

It would appear that R14-2-2306. Billing for Net Metering F. contains two unintended consequences. R14-2-2306. Billing for Net Metering F. Once each calendar year the Electric Utility shall issue a check or billing credit to the Net Metering Customer for the balance of any credit due in excess of amounts owed by the Customer to the Electric Utility. The payment for any remaining credits shall be at the Electric Utility's Avoided Cost. That Avoided Cost shall be clearly identified in the Electric Utility's Net Metering tariff. The stated purpose of paragraph F. is: "the Utility Companies are not in the business of continuing to purchase power from individuals." The two apparently unintended consequences are: 1. The effect of the paragraph potentially puts every Net Metering Customer in the business of selling excess power to the Utility. 2. The result of the calendar year issuance of a check or billing credit to the Net Metering Customer for a credit balance at the Avoided Cost rate potentially puts the Net Metering Customer in the position of having to "re-purchased" that power in the following month at the retail rate. In consideration of the current Net Metering Facility design limitation of 125% (R14-2-2302. Definitions, 13. d.), it would seem unlikely that a system within that design limitation would consistently produce excess power for the following reasons: 1. The design limitation of 125% reported contains a .5% annual consideration for system degradation. 2. There is apparently no Derate Factor having been

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considered in the system design limitation. A. Due to real world efficiency losses (irradiance, dust, temperature, and wiring), there is an expected system power output (AC power) to be less than the output of the system (DC power). This difference is the recognized Derate Factor. B. The default overall DC to AC derate factor of 0.77 is used as an average by the National Renewable Energy Laboratory (NREL). 3. If the NREL Derate Factor of 0.77 is applied to the 125% design limitation, the result, 96%, would appear to indicate that the typical Net Metering Facility, which meets the Net Metering Arizona Administrative Code, would be unlikely to consistently produce electrical power in excess of the Net Metering Customer's individual power requirements. 4. Apparently there were residential customers with installed systems which exceed the 125% Net Metering Facility design limitation. Based on the foregoing information, this comment would urge the Commission to consider amending R14-2-2306. Billing for Net Metering F. The suggested amendment is shown in italics making the paragraph read: F. Once each calendar year the Electric Utility shall issue a check or billing credit to the Net Metering Customer for the balance of any credit due in excess of three times the one month average of customer generated power for the previous 12 month period of amounts owed by the Customer to the Electric Utility. The payment for excess credits shall be at the Electric Utility's Avoided Cost. That Avoided Cost shall be clearly identified in the Electric Utility's Net Metering tariff.

End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

10/22

Emailed to the Phoenix ACC office for docketing.

FILE CLOSED.

End of Comments

Date Completed: 10/22/2013

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