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NAVOPACHE ELECTRIC COOPERATIVE

AZ CORP COMMISSION
DOCKET CONTROL

November 4, 2013

Arizona Corporation Commission
DOCKETED
2013 NOV 5 PM 4:50Commissioner Bob Burns
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

NOV 05 2013

DOCKETED BY
Re: Commissioner Bob Burns' Letter to Docket Regarding Net Metering Dated
October 30, 2013 Filed in Docket No. E-01345A-13-0248

Commissioner Burns:

Regarding your letter to this docket dated October 30, 2013, Navopache Electric
Cooperative, Inc. (Navopache) responds as follows:

1. Navopache has not participated in any campaign related to the Commission's docket on net metering.
2. Navopache has not spent any money to support lobbying efforts of any kind having to do with net metering.
3. Likewise there was no participation by Navopache staff in any net metering campaign.
4. Since no time or money was spent, there is nothing for Navopache to recover through rates or otherwise.

Navopache supports the programs in our Renewable Energy Plan approved by the Commission and advocates member participation in the programs. The implementation of Navopache's renewable energy programs includes an approved budget for promotion of solar and renewable energy programs. The promotional message is intended to encourage members to take advantage of the programs, incentives, and benefits of renewable energy.

Navopache supports the Commission's willingness to investigate and ensure that its renewable, energy efficiency and net metering programs are cost effective and do not have unintended consequences like unintended shift in cost recovery responsibility among customers. However, Navopache cautions against using the limited data associated with a single electric utility (APS) to create a one-size fits all policy. The characteristics of an electric cooperative's organizational structure, system, loads and member consumer base

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are significantly different than those of an APS. Therefore, it is unlikely that a net metering program designed exclusively based upon APS data would also be appropriate for electric cooperatives generally and Navopache specifically.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles R. Moore". The signature is fluid and cursive, with a long horizontal stroke at the end.

Charles R. Moore, P.E.
Chief Executive Officer