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BEFORE THE ARIZONA CORPORATION COM

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AZ CORP COMMISSION
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Bob Stump, Chairman
Gary Pierce, Commissioner
Brenda Burns, Commissioner
Bob Burns, Commissioner
Susan Bitter Smith, Commissioner

IN THE MATTER OF THE APPLICATION
OF ARIZONA PUBLIC SERVICE
COMPANY FOR APPROVAL OF NET
METERING COST SHIFT SOLUTION.

Docket No. E-01345A-13-0248

TASC NOTICE OF FILING PROPOSED AMENDMENTS TO THE STAFF
RECOMMENDED ORDER OF OCTOBER 1, 2013

The Alliance for Solar Choice ("TASC"), through undersigned counsel, respectfully
submits the attached letter proposing amendments to the Staff Recommended Order of October
1, 2013.

RESPECTFULLY SUBMITTED this 8th day of November, 2013.

Arizona Corporation Commission

DOCKETED

NOV 08 2013

DOCKETED BY

By

Hugh L. Hallman
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Suite 100
Tempe, AZ 85281
480-424-3900
Bar No. 12164

Attorney for The Alliance for Solar Choice

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CERTIFICATE OF SERVICE

I hereby certify I have this day sent via hand delivery an original and thirteen copies of the foregoing **NOTICE OF FILING PROPOSED AMENDMENTS TO THE STAFF RECOMMENDED ORDER OF OCTOBER 1, 2013** on this 8th day of November, 2013 with:

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

I hereby certify that I have this day served the foregoing documents via regular mail on all parties of record and all persons listed on the official service list for Docket No. E-01345A-13-0248 on the Arizona Corporation Commission's website:

Arizona Corporation Commission	Janice Alward	1200 W. Washington St. Phoenix, Arizona 85007
Arizona Corporation Commission	Steve Olea	1200 W. Washington St. Phoenix, Arizona 85007
Arizona Corporation Commission	Lyn Farmer	1200 W. Washington St. Phoenix, Arizona 85007
Pinnacle West Capital Corporation	Thomas Loquvam	400 N. 5th St, MS 8695 Phoenix, Arizona 85004
	Lewis Levenson	1308 E. Cedar Lane Payson, Arizona 85541
	Patty Ihle	304 E. Cedar Mill Rd. Star Valley, Arizona 85541
TEP, Co. and UNS Electric, Inc.	Michael Patten Jason Gellman	Roshka, DeWulf & Patten, PLC 400 E. Van Buren St., Ste. 800 Phoenix, Arizona 85004
Arizona Competitive Power Alliance; Water Utility Association of Arizona	Greg Patterson	Munger Chadwick 916 W. Adams St. Ste. 3 Phoenix, Arizona 85007
RUCO	Daniel Pozefsky	1110 West Washington Street Suite 220 Phoenix, Arizona 85007
TEP Co.	Bradley Carroll Kimberly A. Ruht	88 E. Broadway Blvd. MS HQE910 P.O. Box 711 Tucson, Arizona 85702
Arizona Solar Deployment Alliance	Garry Hays	1702 E. Highland Ave., Suite 204 Phoenix, Arizona 85016

1	Grand Canyon State Electric Cooperative Assoc., Inc.	John Wallace	2210 South Priest Dr. Tempe, Arizona 85282
2		Tim Lindl	Keyes, Fox & Wiedman LLP 436 14 th St., Suite 1305 Oakland, CA 94612
3	The Alliance for Solar Choice	Kevin T. Fox	Keyes, Fox & Wiedman LLP 436 14 th St., Suite 1305 Oakland, CA 94612
4	The Alliance for Solar Choice	Anne Smart	45 Fremont Street, 32 nd Floor San Francisco, California 94105
5	Solar Energy Industries Association	Todd Glass	Wilson Sonsini Goodrich & Rosati, PC 701 Fifth Ave., Suite 5100 Seattle, Washington 98104
6	Solar Energy Industries Association	Court S. Rich	Rose Law Group 6613 N. Scottsdale Rd., Ste. 200 Scottsdale, Arizona 85250
7	Interstate Renewable Energy Council, Inc.	Giancarlo Estrada Estrada Legal, P.C.	1 E. Camelback Rd., Suite 550 Phoenix, AZ 85012
8	Interstate Renewable Energy Council, Inc.	Erica M. Schroeder	Keyes, Fox & Wiedman LLP 436 14 th St., Suite 1305 Oakland, CA 94612
9	Western Resources Advocates; Vote for Solar Initiative	Timothy M. Hogan	202 E. McDowell Rd., Suite 153 Phoenix, AZ 85004
10	Western Resource Advocates	David Berry	P.O. Box 1064 Scottsdale, AZ 85252-1064
11	Arizona Solar Energy Industries Association	Mark Holohan	2221 W. Lone Cactus Dr., Suite 2 Phoenix, Arizona 85007
12	Sun City West Property Owners and Residents Assc.	W.R. Hansen	13815 W. Camino del Sol Sun City West, Arizona 85375

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21 Dated this 8th day of November, 2013.

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23 By



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28 Attorney for The Alliance for Solar Choice

November 8, 2013

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007-2927

**Re: Arizona Public Service Company Net Metering Cost Shift Solution
Docket No. E-01345A-13-0248**

To All Parties:

The Alliance for Solar Choice ("TASC") proposes the following amendments to the October 1, 2013 Staff Recommended Order. The following proposed amendments strike from the Recommended Order conclusions and statements regarding facts that are not supported by the record in this proceeding and may only be determined through evidentiary hearings, which have not been held in this proceeding and cannot be held outside of a rate case:

- Strike Paragraph 21 on Page 6, Lines 13-24.
- Strike the following on Page 7, Lines 2-4: "APS also provided additional data that indicate the magnitude of the cost shift within the residential ratepayer class is within the range of \$800 to \$1,000 per year per DG customer."
- Strike the following on Page 9, Line 2: "which are intended to be bridge solutions that begin to address the cost-shift issue"
- Strike the following on Page 14, Lines 12-14: "that begin to address the NM cost-shift issue until the matter can be more comprehensively resolved in a future general rate case"
- Strike from Page 18, Lines 12-13: "Staff understands that utility scale solar PV generation can be obtained in Arizona for between 7 and 10 cents per kWh under a PPA arrangement."

RESPECTFULLY SUBMITTED this 8th day of November, 2013.

By



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