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BEFORE THE ARIZONA CORPORATION COMMISSION

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**IN THE MATTER OF APPLIATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR APPROVAL OF NET METERING
COST SHIFT SOLUTION**

DOCKET NO. E-01345A-13-0248

NOTICE OF FILING

Arizona Solar Deployment Alliance ("ASDA") files a proposed amendment in the above captioned docket. ASDA still strongly supports Staff's initial recommendations of resolving the issues raised in this docket in a rate case. If, however, the Commission determines that some mechanism needs to be in place before the next rate case, ASDA respectfully requests the Commission consider the proposed amendment attached to this filing.

RESPECTFULLY SUBMITTED this 12th day of November, 2013

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Original and thirteen (13)
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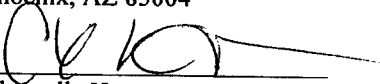
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ASDA Proposed Amendment

Finding of Fact 32

Page 9, Line 8: Strike third sentence and insert: "The development of equitable rate structures for NM customers, based on volumetric consumption, is best suited for a general rate case. However, the Commission believes a modest adjustment to the LFCR mechanism for NM customers is appropriate at this time"

Insert New Finding of Fact 71

Insert: "Having reviewed Staff's two recommendations, the Commission recognizes that the primary purpose of a DG system is to offset the purchase of energy from APS. We also recognize that the percentage of a NM customer's energy needs offset by a DG system vary by season and by the NM customer's consumption profile. As such, NM customers may purchase a high volume of their energy from APS or a negligible amount, resulting in payments to APS that vary from NM customer to NM customer. To account for this variation in NM customer payments toward APS's fixed costs, The Commission will institute a modified LFCR Flat Charge provision for all new APS NM customers only, unless the customer chooses the ETC-2 rate.

The Modified LFCR Flat Charge for NM customers inverts the daily Flat Charge cap, as illustrated in Table III below. The less net energy purchased by the DG customer in a month, the higher the Flat Charge cap; the more net energy purchased by a DG customer in a month, the lower the Flat Charge cap. This results in DG customers who offset a higher portion of their energy needs paying more toward APS's fixed costs than DG customers who offset a lower portion of their bill.

Table III: Modified LFCR Flat Charge for NM Customers

Total Monthly Net Energy Purchased (kWh)	Modified LFCR Flat Charge Rate (30 day billing cycle)
0-400 kWh	\$6.51
401-800 kWh	\$2.76
801-2000 kWh	\$1.20
2001 kWh and greater	\$0.60

ORDER

Page 21, Line 12, Strike: "will take no action on the instant application and defer the matter for", Insert: "adopt, for all new DG customers after Dec-31, 2013, the 'Modified LFCR Flat Charge for NM Customers' as an interim solution until this matter is brought to the Commission for"

Make all conforming changes