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OPEN MEETING

MEMORANDUM
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Arizona Corporation Commission
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NOV 3 2014

TO: THE COMMISSION **2014 NOV -3 P 2: 58**

FROM: Utilities Division **ARIZONA CORPORATION COMMISSION
DOCKET CONTROL**

DATE: November 3, 2014

DOCKETED BY

RE: TUCSON ELECTRIC POWER COMPANY'S APPLICATION FOR APPROVAL OF ITS 2015 RENEWABLE ENERGY STANDARD IMPLEMENTATION PLAN (DOCKET NO. E-01933A-14-0248)

On July 1, 2014, Tucson Electric Power Company ("TEP" or "Company") filed for Arizona Corporation Commission ("Commission") approval of its 2015 Renewable Energy Standard and Tariff ("REST") Implementation Plan. On July 18, 2014, TEP filed Exhibit 9 to its REST implementation plan.

On July 21, 2014, the Arizona Solar Deployment Alliance filed to intervene in this proceeding; this request was granted on July 31, 2014. On July 31, 2014, Kevin Koch filed to intervene in this proceeding; this request was granted on August 11, 2014. On August 21, 2014, the Residential Utility Consumer Office ("RUCO") filed to intervene in this proceeding; this request was granted on September 2, 2014. On September 15, 2014, The Clean Coalition filed comments. On September 16, 2014, The Alliance for Solar Choice ("TASC") filed to intervene in this proceeding; this request was granted on September 26, 2014. On October 15, 2014, the Sierra Club - Grand Canyon Chapter filed comments. On October 17, 2014 RUCO filed comments. A number of individuals also filed comments in the docket.

TEP's initial filing requests approval of various REST plan components, including a budget, customer class caps, various program details, introduction of a Company-owned rooftop solar program, and compliance matters.

TEP's Five Year Projection of Energy, Capacity, and Costs

The table below shows TEP's forecast for energy, capacity, and costs for its annual REST plans from 2015 through 2019.

TEP Energy, Capacity, and Cost Forecast					
	2015	2016	2017	2018	2019
Forecast Retail Sales MWh	9,189,835	9,452,893	10,037,708	10,363,922	10,523,289
% Renewable Energy Required	5.00%	6.00%	7.00%	8.00%	9.00%
Overall Renewable Requirement MWh	459,492	567,174	702,640	829,114	947,096
Utility Scale MWh	321,644	397,022	491,848	580,380	662,967
Utility Scale Cumulative MW					
DG Requirement MWh	137,848	170,152	210,792	248,734	284,129
Res DG Requirement MWh	68,924	85076	105,396	124,367	142,064

Res DG Cumulative MW					
Non-Res DG Requirement MWh	68,924	85,076	105,396	124,367	142,064
Non-Res Cumulative MW					
Total Cumulative Required MW	263	324	402	474	541
Total Program Cost	\$40,178,385	\$45,260,634	\$44,250,961	\$33,026,749	\$31,488,872

TEP REST Experience Under 2014 REST Plan

The Commission-approved implementation plan for 2014 contemplated total spending of \$40.1 million and total recoveries through the REST surcharge of \$33.6 million.

Regarding installations and reservations, the table below summarizes installations and reservations for installations through August 21, 2014 by TEP.

Residential	Photovoltaics		Solar Hot Water	
	Number of Systems	kW (kWh)	Number of Systems	kWh
2014 Installations	465	3,625 (6,343,750)	46	118,624
Reservations	1305	9,195 (16,091,250)	28	81,275

Commercial	Photovoltaics		Solar Hot Water	
	Number of Systems	kW (kWh)	Number of Systems	kWh
2014 Installations	18	3,841 (6,739,250)	NA	NA
Reservations	41	10,567 (18,492,250)	NA	NA

In the month of September 2014, TEP received an additional 519 applications for residential DG, representing 3,952 kW of capacity.

Since TEP provided this information to Staff, TEP has subsequently indicated that residential DG activity in its service territory has ramped up significantly, with projected 2014 residential DG installations now expected to approach 20 MW. TEP has indicated to Staff that this represents the equivalent of what would be required for compliance under the REST rules for a three year period assuming the kWhs and/or Renewable Energy Credits ("RECs") from these installations were counted towards REST compliance. Staff notes that TEP has not received the RECs for these installations and thus does not count these installations toward its compliance with REST requirements. TEP has further indicated that while it expects to have enough residual RECs to be at or near compliance at the end of 2014, the Company expects to fall short of the REC requirement for residential DG in 2015.

Systems That Do Not Take a Utility Incentive

The following table shows the number, kW, and kWh of systems that have been installed in TEP's service territory that have not taken an incentive from TEP and thus TEP has not used the associated RECs to achieve compliance under the REST rules.

Residential	Number of Projects	kW	kWh
2012	0	0	0
2013	54	400	652,392
2014	681	4,685	7,692,746
Non-Residential			
2012	3	178.8	312,953
2013	8	5,011	8,769,688
2014	15	3,031	5,303,900

Commercial DG Over-compliance

Staff noted in its Staff Report on TEP's 2012 REST plan that TEP was significantly over-compliant for commercial DG and the Staff Report included a table that summarized the situation in 2012 and following years. Below is an updated table showing the current and projected status of commercial DG over-compliance. In summary, the size of the negative number on the last line indicates the size of the commercial DG over-compliance TEP projects for each year through 2019.

Commercial	2015	2016	2017	2018	2019
Sales Forecast	9,189,835,000	9,452,893,000	10,037,708,000	10,363,922,000	10,523,289,000
Overall Requirement	5.00%	6.00%	7.00%	8.00%	9.00%
Overall DG kWh Requirement	137,847,525	170,152,074	210,791,868	248,734,128	284,128,803
Non-Residential DG kWh Requirement	68,923,763	85,076,037	105,395,934	124,367,064	142,064,402
Existing Non-Residential kWh Prior to 2014	90,360,063	90,360,063	90,360,063	90,360,063	90,360,063
Incremental Non-Residential DG Requirement	7,699,953	16,152,275	20,319,897	18,971,130	17,697,338
10% Allowed kWh from Wholesale DG per R14.2.805	13,784,753	17,015,207	21,079,187	24,873,413	28,412,880
Estimated kWh from Ft. Huachuca DG Project	43,000,000	43,000,000	43,000,000	43,000,000	43,000,000
Total Required kWh Non-Residential DG After Adjustment	-78,221,053	-65,299,233	-49,043,316	-33,866,412	-19,708,542

Leased Versus Non-Leased Systems

TEP indicates that a significant majority of residential systems are leased in 2013 and into August 2014 (1,280 leased systems versus 738 non-leased systems). TEP indicates that 45 of 52 non-residential systems installed in 2013 and all 18 non-residential systems installed so far in 2014 are non-leased.

Research and Development

The Commission approved research and development (“R&D”) funding at a level of \$275,000 for 2014. TEP’s proposed funding level for R&D in 2015 is \$253,000. This includes funding for photovoltaic (“PV”) panel lab degradation testing, solar test yard maintenance, the solar and wind forecast integration portal, an energy storage and grid operations study and dues for industry organizations. Staff believes TEP’s proposed funding level for R&D is reasonable and should be approved.

Solar Hot Water Heating Funding

TEP’s approved 2014 REST plan included the availability of funding for solar hot water heating of \$60,000, with an incentive of \$0.40 per kWh. TEP has indicated that at this incentive level in 2014, there continue to be solar hot water heating installations, and TEP estimates that most of these funds will be exhausted by the end of 2014. Staff believes that continued funding of solar water heating at the \$60,000 level of an incentive of \$0.40 per kWh in 2015 is reasonable.

Bright Tucson Solar Buildout Plan

In recent years the Commission has approved continuation of TEP’s buildout program at a rate of \$28 million annually. In Decision No. 74165 (October 25, 2013), the Commission approved \$28 million in buildout program funding for 2014, with a further \$12 million in 2015 for the Fort Huachuca project. TEP indicates in its current filing that it will no longer seek approval of buildout funding through the REST implementation plan, but rather will seek recovery of the cost of future utility-scale renewable energy projects via traditional cost recovery means. The table below shows the costs anticipated to be recovered through the REST budget in 2015-2017.

Line Item	2015	2016	2017
Carrying Costs	\$3,826,682	\$4,832,385	\$4,519,820
Book Depreciation	\$3,550,407	\$4,438,532	\$4,438,532
Property Tax Expense	\$208,871	\$392,960	\$451,492
Operations and Maintenance	\$436,570	\$517,167	\$532,682
Total	\$8,022,529	\$10,181,044	\$9,942,526

Energy Storage Solicitation

TEP indicates in its application that it plans to issue a solicitation in 2015 for up to 10 MW of storage capacity. TEP indicates that as the grid experiences higher penetration levels of intermittent and variable renewable generation, the need for flexible resources such as energy storage will be needed to address a variety of operational issues. TEP seeks Commission guidance on how cost recovery for such a project would occur and specifically what the Commission views as the preferred cost recovery mechanism for costs for such a project at this time. TEP believes that current allowable Federal Energy Regulatory Commission ("FERC") accounts for TEP's Purchased Power and Fuel Adjustment Clause ("PPFAC") would not provide for recovery of storage costs through that mechanism and that it is not clear whether such costs could be recovered through the REST surcharge. TEP's filing also indicates that the cost recovery mechanism could depend on the nature of the storage resource. In discussions with TEP, the Company has indicated that it is likely, if it moved forward with an energy storage project as a result of the solicitation, that the Company would not build and operate a facility, but would rather enter into a long term purchased power type of agreement to contract with an entity for energy storage services, given the Company's lack of experience with such facilities.

Given these circumstances, Staff believes it is reasonable to provide guidance on what would be the preferred cost recovery method at this time, recognizing that the issue could be revisited in the future when the results of the solicitation are known and other relevant information may become available. In addition, Staff notes that the services TEP seeks in its energy storage solicitation are identical to the services in its already approved DR program. Staff further notes that TEP is currently recovering the costs of its DR program through its PPFAC, although Staff recommended recovery through TEP's DSM surcharge. Therefore, approving recovery of the energy storage solicitation through its PPFAC would be consistent with this. Given that TEP indicates that the energy storage facility could be a power purchase-type agreement, Staff recommends cost recovery through the PPFAC be considered the preferred cost recovery method, for now. Staff believes it is reasonable to discuss this issue further in the future when TEP brings further information before the Commission regarding its proposed energy storage solicitation.

Staff further recommends that TEP, as part of its 2016 REST plan filing, report the results of the energy storage solicitation to the Commission, including results of the solicitation, estimated customer impacts if recovered through the PPFAC, and other information TEP believes is relevant to the Commission's consideration of the energy solicitation results.

Utility-Owned Distributed Generation Program

TEP's application seeks Commission approval of a new program under which TEP would own residential customer-sited DG. To date, residential customer-sited DG has entailed either the customer owning the system or the system being installed under some kind of lease arrangement. For TEP the Commission had previously approved a non-residential DG program, the Bright Roofs program, that is similar to the Company's current proposal. The Bright Roofs program allowed TEP to own DG on non-residential rooftop locations and count such DG toward its non-residential DG REST requirements, though there was little activity under the Bright Roofs program and the program was subsequently discontinued.

TEP proposes to spend up to \$10 million under this program to install approximately 3.5 MW of utility-owned residential rooftop DG, based on an expected installed cost of \$2.85 to \$3.00 per watt.¹ Assuming the typical system installed under this program is approximately 6 kW, the program would enable the installation of roughly 600 residential DG systems. Given TEP's current installation rate, with TEP reporting more than 500 applications in the month of September 2014, installations under this program are likely to represent a relatively small segment of the residential DG market in TEP's service territory.

Residential customers who participate in the program would enter into a contract with TEP to allow the Company to install a rooftop DG system on their roof. TEP would install a system that approximates the annual energy usage of the given customer in question. The customer would pay a fixed amount each month, approximately \$99 for a typical residential customer, equivalent to what they are currently paying, for the life of the system (\$93.00 plus taxes and surcharges). The life of the system would be 25 years, based upon the manufacturer's warranty. The contract between TEP and the customer would include a buyout provision if the customer wished to buy the system at some point. If annual average monthly consumption rose or fell by more than 15 percent, the customer's fixed charge would be adjusted accordingly. TEP would prescreen rooftops so that installations under this program would only target roofs in good condition. If a home with a utility-owned DG system was sold, the system would stay with the home and the new owner/resident of the home would assume responsibilities under the contract the original owner had signed with TEP (assuming the customer does not exercise the option to buy the system).

TEP is not seeking any cost recovery through the 2015 REST plan and would seek recovery of expenditures under this program in TEP's next rate case. The prudence of TEP's expenditures under this program would be reviewed in TEP's next rate case. TEP would credit back revenue beyond the customer charge (\$10) and remaining fixed cost (\$30.80) to pay for the capital costs of the systems. The table below shows a comparison provided by TEP of what a typical customer pays under different scenarios.

	Existing Customer	Net-Zero Customer	Customer under proposed TEP Program
Customer Charge	\$10.00	\$10.00	
Delivery Margin	\$20.20		
Fixed Costs	\$30.80		
Fuel	\$32.00		
Monthly Payment			\$93.00
Total Monthly Payment (absent taxes and surcharges)	\$93.00	\$10.00	\$93.00

TEP's program would enable the Company to retain the revenue stream from a customer who has rooftop solar in a way that does not occur with net-metering. Because of this, TEP's

¹ TEP's expected capital cost closely approximates APS's estimated installed costs under APS's newly proposed utility-owned residential DG program. APS estimates installed cost ranging from \$2.85 to \$3.50 per watt.

proposal may ameliorate the contentious issue of cost-shifting between rooftop and non-rooftop customers. Customers taking service under TEP's proposal would be paying costs through the fixed charge that otherwise would be passed to other customers through the lost fixed cost recovery ("LFCR") charge. TEP would retain the RECs from systems under this program and these RECs could count toward REST compliance for TEP, though the volume of RECs from the proposed program would not be sufficient for TEP to maintain compliance with the REC requirement in a post-incentive environment.

TEP would contract with installers to install and maintain systems under the program. While TEP's filing references local installers, all vendors who meet TEP's specified requirements (discussed below) will be eligible to participate in the solicitation. TEP will use a traditional vendor solicitation process to select the installers. The solicitation will outline vendor product, installation, financial, and experience requirements, require licenses and permits, performance and warranty expectations, and costs. TEP will enter into Master Service Agreements with selected installers as it does with other third party contractors. TEP will target installations to areas on its grid where DG will provide the most benefit to utility operations. TEP believes that this program will inherently provide access to DG to customers who were unable to install DG in the past due to financial constraints and/or low credit scores.

A benefit to TEP of the program is that it would be able to use its new systems communications network it is currently developing to allow TEP to communicate with and control the inverters on systems installed under the proposed program to provide benefits to the grid, such as voltage and frequency support.

TEP's proposal would provide TEP customers with a new option for installing rooftop solar that is different than options available now and this option would widen the pool of possible participants to some customers who were previously not able to pursue rooftop solar.

From information Staff has reviewed, Staff does not believe that the program will fully pay for itself, but rather it appears that it would significantly lessen the cost shift to non-participating ratepayers in comparison with a customer who currently purchases or leases a rooftop system. There are many uncertainties regarding how the program would fare in the renewable energy marketplace in comparison to other existing methods of rooftop DG deployment. The Commission's ability to review the prudence of this program in TEP's next rate case provides the Commission with the ability to protect ratepayer interests.

Staff believes that TEP's proposal should be viewed as a pilot program that will test a new method of rooftop DG delivery and should be reviewed in the future and modified as necessary, in addition to TEP's future rate proceedings when the prudence of the program may be considered.

In essence TEP's proposal is a way of treating company-owned rooftop DG in a manner similar to traditional generation resources, which are constructed and then put into rate base in future rate proceedings after review by the Commission.

While it is anticipated that the program's prudence and related matters would be considered in future TEP rate proceedings, Staff believes that it would be appropriate for TEP to report on its experience with the program as part of each future REST plan filing. Thus, Staff recommends that

TEP include a discussion of the program in its annual REST plan filings, beginning with the 2016 REST plan to be filed in July 2015, as long as the program continues to exist.

Staff recommends approval of TEP's proposed program for utility-owned residential rooftop DG, with a limit on expenditures of \$10 million.

In discussions with TEP the Company has indicated that it believed that larger scale distributed generation facilities located in TEP's grid, possibly 1 MW or so, and structured similarly to TEP' proposed Company-owned DG program, could provide most of the benefits of rooftop DG at a reduced cost. Staff believes that this option, or a purchased power agreement for such a facility is worthy of further exploration and recommends that TEP, as part of its 2016 REST plan filing, include a report on the feasibility, costs, benefits, and other aspects of these options and if TEP wishes, an implementation proposal, as part of TEP's REST activities. TEP's analysis should include a comparison of these options with company-owned and customer-owned distributed generation options.

2014 REST Budget Proposals

The TEP and Staff REST plan budget proposal will be discussed in the remainder of this document.

2013 Funds Carried Forward to 2015 REST Budget

TEP's filing reflects the carry-forward of \$6,826,415 in unspent funds from TEP's 2013 REST budget. The table below accounts for which line items of TEP's 2013 REST budget those funds came from.

2013 Tariff Revenue	-\$1,588,251
Lower Cost Purchased Renewable Energy	\$5,141,428
Customer Sited Distributed Renewable Energy	\$2,427,555
Labor and Administration	\$792,296
Other Budget Items	\$18,633
Total Unspent 2013 REST funds	\$6,826,415

The TEP and Staff REST budget proposal discussed herein reflect this carry-forward of unspent 2013 REST funds which reduce the amount of money required to be recovered through the 2015 REST surcharge.

Incentive Levels

Consistent with the Commission approved 2014 REST plan and budget, the only incentive money proposed for 2015 is a continuation of the solar water heater program as discussed above. The proposed budget also includes performance-based incentive funds to meet previously made commitments.

Staff notes that TEP projects it will not have enough RECs to achieve residential DG compliance for 2015. Even if the Commission approves TEP's proposal to own residential rooftop

DG systems, TEP still expects to fall short of residential DG REC requirements in 2015. Staff notes the irony of this in light of the fact that TEP has experienced unprecedented levels of DG installations in 2014.

Proposed TEP and Staff Budgets

Staff has reviewed the budget proposal contained in TEP's proposed 2015 REST plan and agrees with TEP's proposed budget. The table below summarizes the budget being proposed by TEP and Staff.

Budget Components	2014 Approved Budget	2015 TEP and Staff Proposal
<i>Purchased Renewable Energy</i>		
Above market cost of conventional generation	\$25,481,208	\$22,971,774
TEP Owned	\$5,230,122	\$8,022,529
Subtotal	\$30,711,330	\$30,994,303
<i>Customer Sited Distributed Renewable Energy</i>		
Residential PV UFI	\$0	\$0
Non-Residential PV UFI	\$0	\$0
Non-Residential PBI On-Going Commitments	\$7,944,363	\$7,214,196
Residential/Non-residential Solar Water Heating UFI	\$60,000	\$60,000
Meter Reading	\$35,363	\$35,363
Customer Education and Outreach	\$100,000	\$100,000
Subtotal	\$8,139,726	\$7,409,559
<i>Technical Training</i>		
Internal and Contractor Training	\$75,000	\$85,000
Subtotal	\$75,000	\$85,000
<i>Information Systems</i>		
Subtotal	\$100,000	\$100,000
<i>Metering</i>		
Subtotal	\$118,204	\$501,680
<i>Labor and Administration</i>		
Internal Labor	\$339,103	\$468,442
External Labor	\$300,710	\$302,401
Materials, Fees, Supplies	\$60,000	\$60,000
AZ Solar Website	\$4,000	\$4,000
Subtotal	\$703,813	\$834,843
<i>Research and Development</i>		
Energy Storage and Grid Study		\$38,000

PV Degradation Testing and Analysis	\$53,000	\$50,000
Solar Test Yard Maintenance Equipment	\$25,000	\$50,000
Solar and Wind Forecast Integration Portal	\$182,000	\$100,000
Dues and Fees	\$15,000	\$15,000
Subtotal	\$275,000	\$253,000
Total Spending	\$40,123,073	\$40,178,385
Carryover of Previous Year's Funds	-\$6,521,430	-\$6,826,416
Total Amount for Recovery	\$33,601,643	\$33,351,969

Recovery of Funds Through 2015 REST Charge

TEP's proposed caps and per kWh charge are designed to recover TEP's proposed spending and recovery levels in 2015. Staff's proposed caps and per kWh charge are designed to recover Staff's proposed budget of \$40.1 million and recovery level of \$33.5 million. Given the relatively similar amount to recover in 2015 in comparison to 2014, TEP is proposing to not change the class caps or surcharge level.

Staff believes that, given TEP's tendency to have funds left over at the end of each calendar year, and that the difference, while not enormous, is still a significant amount of money, the residential customer cap should be reduced to reflect the lower amount to be recovered through the REST surcharge in 2015 under the TEP/Staff budget proposal. Staff therefore recommends adjusting the residential class cap downward to \$3.78 to reflect the slightly lower amount to recover in 2015.

The table below shows the proposed surcharge per kWh for the TEP and Staff options as well as the proposed caps under each option, in comparison to what is currently in effect for 2014.

	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
REST Charge (per kWh)	\$0.008	\$0.008	\$0.008
<i>Class Caps</i>			
Residential	\$3.83	\$3.83	\$3.78
Small General Service (Small Commercial)	\$100.00	\$100.00	\$100.00
Large General Service (Large Commercial)	\$1,015.00	\$1,015.00	\$1,015.00
Industrial and Mining	\$8,000.00	\$8,000.00	\$8,000.00
Lighting	\$100.00	\$100.00	\$100.00

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The cost recovery by customer class for the approved 2014 REST plan and estimates for the TEP and Staff options for the 2014 REST plan are shown in the table below. For comparison purposes, the table below also shows the projected MWH sales by customer class for 2014.

	2013 Actual Sales (MWH)	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residential	3,836,078 (42.2%)	\$14,587,641 (43.4%)	\$14,779,396 (44.1%)	\$14,632,163 (43.9%)
Small General Service	2,122,981 (23.3%)	\$10,304,762 (30.6%)	\$10,244,784 (30.6%)	\$10,244,784 (30.7%)
Large General Service	1,124,481 (12.4%)	\$5,626,584 (16.7%)	\$5,727,369 (17.1%)	\$5,727,369 (17.2%)
Industrial and Mining	1,969,950 (21.7%)	\$2,880,000 (8.6%)	\$2,496,000 (7.5%)	\$2,496,000 (7.5%)
Lighting	32,350 (0.4%)	\$234,711 (0.7%)	\$256,281 (0.8%)	\$256,281 (0.8%)
Total	9,085,840	\$33,633,698	\$33,503,830	\$33,356,598

The table below shows the contribution, per kWh consumed, for each customer class (projected class cost recovery divided by projected class kWh sales). The table thus provides a comparison of the relative contribution to REST funding by each customer class on a per kWh basis.

Contribution by Customer Class (per kWh)	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residential	\$0.0038	\$0.0039	\$0.0038
Small Commercial	\$0.0048	\$0.0048	\$0.0048
Large Commercial	\$0.0048	\$0.0051	\$0.0051
Industrial/ Mining	\$0.0015	\$0.0013	\$0.0013
Lighting	\$0.0063	\$0.0008	\$0.0008

The table below shows the average REST charge by customer class as well as the percentage of customers at the cap for each customer class.

	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residential - Average Bill	\$3.25	\$3.22	\$3.19
Small Commercial - Average Bill	\$18.94	\$20.77	\$20.77
Large Commercial - Average Bill	\$778.98	\$779.66	\$779.66

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Industrial and Mining - Average Bill	\$8,000	\$8,000	\$8,000
Lighting - Average Bill	\$15.49	\$11.71	\$11.71
Residential – Percent at Cap	72.0%	64.2%	64.2%
Small Commercial – Percent at Cap	8.4%	6.5%	6.5%
Large Commercial – Percent at Cap	46.9%	45.0%	45.0%
Industrial and Mining – Percent at Cap	100.0%	99.0%	99.0%
Lighting – Percent at Cap	0.7%	0.5%	0.5%

Estimated customer bill impacts for various monthly consumptions are shown in the table below.

Example Customer Types	kWh / mo.	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residence Consuming	400	\$3.20	\$3.20	\$3.20
Residence Consuming	850	\$3.83	\$3.83	\$3.78
Residence Consuming	2,000	\$3.83	\$3.83	\$3.78
Dentist Office	2,000	\$16.00	\$16.00	\$16.00
Hairstylist	3,900	\$31.20	\$31.20	\$31.20
Department Store	170,000	\$100.00	\$100.00	\$100.00
Mall	1,627,100	\$1015.00	\$1015.00	\$1015.00
Retail Video Store	14,400	\$100.00	\$100.00	\$100.00
Large Hotel	1,067,100	\$1015.00	\$1015.00	\$1015.00
Large Building Supply	346,500	\$1015.00	\$1015.00	\$1015.00
Hotel/Motel	27,960	\$100.00	\$100.00	\$100.00
Fast Food	60,160	\$100.00	\$100.00	\$100.00
Large High Rise Office Bldg	1,476,100	\$1015.00	\$1015.00	\$1015.00

Hospital (< 3 MW)	1,509,600	\$1015.00	\$1015.00	\$1015.00
Supermarket	233,600	\$1015.00	\$1015.00	\$1015.00
Convenience Store	20,160	\$100.00	\$100.00	\$100.00
Hospital (> 3 MW)	2,700,000	\$8,000.00	\$8,000.00	\$8,000.00
Copper Mine	72,000,000	\$8,000.00	\$8,000.00	\$8,000.00

Staff Recommendations

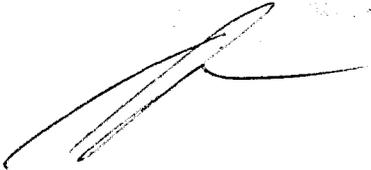
1. Staff recommends that the Commission approve the Staff budget option for the 2015 REST plan, reflecting a REST surcharge of \$0.00800 per kWh, and related caps of \$3.78 for the residential class, \$100.00 for the small general service class, \$1,015.00 for the large general service class, \$8,000.00 for the industrial and mining class, and \$100.00 for the lighting class. This includes total spending of \$40,178,385 and a total amount to be recovered through the REST surcharge of \$33,351,969.
2. Staff further recommends that solar hot water heating continue to be funded at the \$60,000 level, with an incentive level of \$0.40 per kWh in 2015.
3. Staff further recommends that the Commission indicate that its current preference for cost recovery of a project resulting from TEP's energy storage solicitation is through the PPFAC, subject to further consideration in the future.
4. Staff further recommends that TEP file, as part of its 2016 REST plan proposal, information on the energy storage solicitation, including results of the solicitation, and other information TEP believes is relevant to the Commission's consideration of the energy storage solicitation results.
5. Staff further recommends approval of TEP's proposal for utility-owned residential distributed generation program, with a limit on expenditures of \$10 million.
6. Staff further recommends that TEP, as part of its 2016 REST plan filing, include a report on the feasibility, costs, benefits, and other aspects of larger scale distributed generation options, either company-owned or through purchased power agreements, and if TEP wishes, an implementation proposal, as part of TEP's REST activities. TEP's analysis should include a comparison of these options with company-owned and customer-owned distributed generation options.
7. Staff further recommends that TEP include a discussion of the utility-owned residential distributed generation program in its annual REST plan filings, beginning with the 2016 REST plan to be filed in July 2015, as long as the program continues to exist.

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8. Staff further recommends that TEP file the REST-TS1 and Residential Solar-Company-owned Systems Tariff, consistent with the Decision in this case, within 15 days of the effective date of the Decision.



Steven M. Olea
Director
Utilities Division

SMO:RGG:sms\CHH

ORIGINATOR: Robert Gray

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BEFORE THE ARIZONA CORPORATION COMMISSION

- BOB STUMP
Chairman
- GARY PIERCE
Commissioner
- BRENDA BURNS
Commissioner
- BOB BURNS
Commissioner
- SUSAN BITTER SMITH
Commissioner

IN THE MATTER OF THE APPLICATION)
 OF TUCSON ELECTRIC POWER)
 COMPANY FOR APPROVAL OF ITS 2015)
 RENEWABLE ENERGY STANDARD)
 IMPLEMENTATION PLAN.)

DOCKET NO. E-01933A-14-0248
 DECISION NO. _____
ORDER

Open Meeting
 November 5 and 6, 2014
 Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. Tucson Electric Power Company (“TEP” or “Company”) is engaged in providing electric service within portions of Arizona, pursuant to authority granted by the Arizona Corporation Commission (“ACC” or “Commission”).
2. On July 1, 2014, Tucson Electric Power Company (“TEP” or “Company”) filed for Arizona Corporation Commission (“Commission”) approval of its 2015 Renewable Energy Standard and Tariff (“REST”) Implementation Plan. On July 18, 2014, TEP filed Exhibit 9 to its REST implementation plan.
3. On July 21, 2014, the Arizona Solar Deployment Alliance filed to intervene in this proceeding; this request was granted on July 31, 2014. On July 31, 2014, Kevin Koch filed to intervene in this proceeding; this request was granted on August 11, 2014. On August 21, 2014, the Residential Utility Consumer Office (“RUCO”) filed to intervene in this proceeding; this request was

1 granted on September 2, 2014. On September 15, 2014, The Clean Coalition filed comments. On
 2 September 16, 2014, The Alliance for Solar Choice ("TASC") filed to intervene in this proceeding;
 3 this request was granted on September 26, 2014. On October 15, 2014, the Sierra Club – Grand
 4 Canyon Chapter filed comments. On October 17, 2014 RUCO filed comments. A number of
 5 individuals also filed comments in the docket.

6 4. TEP's initial filing requests approval of various REST plan components, including a
 7 budget, customer class caps, various program details, introduction of a Company-owned rooftop solar
 8 program, and compliance matters.

9 TEP's Five Year Projection of Energy, Capacity, and Costs

10 5. The table below shows TEP's forecast for energy, capacity, and costs for its annual
 11 REST plans from 2015 through 2019.

TEP Energy, Capacity, and Cost Forecast					
	2015	2016	2017	2018	2019
Forecast Retail Sales MWh	9,189,835	9,452,893	10,037,708	10,363,922	10,523,289
% Renewable Energy Required	5.00%	6.00%	7.00%	8.00%	9.00%
Overall Renewable Requirement MWh	459,492	567,174	702,640	829,114	947,096
Utility Scale Requirement MWh	321,644	397,022	491,848	580,380	662,967
DG Requirement MWh	137,848	170,152	210,792	248,734	284,129
Res DG Requirement MWh	68,924	85,076	105,396	124,367	142,064
Non-Res DG Requirement MWh	68,924	85,076	105,396	124,367	142,064
Total Cumulative Required MW	263	324	402	474	541
Total Program Cost	\$40,178,385	\$45,260,634	\$44,250,961	\$33,026,749	\$31,488,872

21 TEP REST Experience Under 2014 REST Plan

22 6. The Commission-approved implementation plan for 2014 contemplated total spending
 23 of \$40.1 million and total recoveries through the REST surcharge of \$33.6 million.

24 7. Regarding installations and reservations, the table below summarizes installations and
 25 reservations for installations through August 21, 2014 by TEP.

Residential	Photovoltaics		Solar Hot Water	
	Number of Systems	kW (kWh)	Number of Systems	kWh
2014 Installations	465	3,625	46	118,624

		(6,343,750)		
Reservations	1305	9,195 (16,091,250)	28	81,275

Commercial	Photovoltaics		Solar Hot Water	
	Number of Systems	kW (kWh)	Number of Systems	kW
2014 Installations	18	3,841 (6,739,250)	NA	NA
Reservations	41	10,567 (18,492,250)	NA	NA

In the month of September 2014, TEP received an additional 519 applications for residential DG, representing 3,952 kW of capacity.

8. Since TEP provided this information to Staff, TEP has subsequently indicated that residential DG activity in its service territory has ramped up significantly, with projected 2014 residential DG installations now expected to approach 20 MW. TEP has indicated to Staff that this represents the equivalent of what would be required for compliance under the REST rules for a three year period assuming the kWhs and/or Renewable Energy Credits ("RECs") from these installations were counted towards REST compliance.

9. Staff would note that TEP does not receive the RECs for these installations and thus does not count these installations toward its compliance with REST requirements. TEP has further indicated that while it expects to have enough residual RECs to be at or near compliance at the end of 2014, the Company expects to fall short of the REC requirement for residential DG in 2015.

Systems That Do Not Take a Utility Incentive

10. The following table shows the number, kW, and kWh of systems that have been installed in TEP's service territory that have not taken an incentive from TEP and thus TEP has not used the associated RECs to achieve compliance under the REST rules.

Residential	Number of Projects	kW	kWh
2012	0	0	0
2013	54	400	652,392
2014	681	4,685	7,692,746
Non-Residential			
2012	3	178.8	312,953

2013	8	5,011	8,769,688
2014	15	3,031	5,303,900

Commercial DG Over-compliance

11. Staff noted in its Staff Report on TEP's 2012 REST plan that TEP was significantly over-compliant for commercial DG and the Staff Report included a table that summarized the situation in 2012 and following years. Below is an updated table showing the current and projected status of commercial DG over-compliance. In summary, the size of the negative number on the last line indicates the size of the commercial DG over-compliance TEP projects for each year through 2019.

Commercial	2015	2016	2017	2018	2019
Sales Forecast	9,189,835,000	9,452,893,000	10,037,708,000	10,363,922,000	10,523,289,000
Overall Requirement	5.00%	6.00%	7.00%	8.00%	9.00%
Overall DG kWh Requirement	137,847,525	170,152,074	210,791,868	248,734,128	284,128,803
Non-Residential DG kWh Requirement	68,923,763	85,076,037	105,395,934	124,367,064	142,064,402
Existing Non-Residential kWh Prior to 2014	90,360,063	90,360,063	90,360,063	90,360,063	90,360,063
Incremental Non-Residential DG Requirement	7,699,953	16,152,275	20,319,897	18,971,130	17,697,338
10% Allowed kWh from Wholesale DG per R14.2.805	13,784,753	17,015,207	21,079,187	24,873,413	28,412,880
Estimated kWh from Ft. Huachuca DG Project	43,000,000	43,000,000	43,000,000	43,000,000	43,000,000
Total Required kWh Non-Residential DG After Adjustment	-78,221,053	-65,299,233	-49,043,316	-33,866,412	-19,708,542

1 **Leased Versus Non-Leased Systems**

2 12. TEP indicates that a significant majority of residential systems are leased in 2013 and
3 into August 2014 (1,280 leased systems versus 738 non-leased systems). TEP indicates that 45 of 52
4 non-residential systems installed in 2013 and all 18 non-residential systems installed so far in 2014 are
5 non-leased.

6 **Research and Development**

7 13. The Commission approved research and development ("R&D") funding at a level of
8 \$275,000 for 2014. TEP's proposed funding level for R&D in 2015 is \$253,000. This includes
9 funding for photovoltaic ("PV") panel lab degradation testing, solar test yard maintenance, the solar
10 and wind forecast integration portal, an energy storage and grid operations study and dues for industry
11 organizations. Staff believes TEP's proposed funding level for R&D is reasonable and should be
12 approved.

13 **Solar Hot Water Heating Funding**

14 14. TEP's approved 2014 REST plan included the availability of funding for solar hot
15 water heating of \$60,000, with an incentive of \$0.40 per kWh. TEP has indicated that at this incentive
16 level in 2014, there continue to be solar hot water heating installations, and TEP estimates that most
17 of these funds will be exhausted by the end of 2014. Staff believes that continued funding of solar
18 water heating at the \$60,000 level of an incentive of \$0.40 per kWh in 2015 is reasonable.

19 **Bright Tucson Solar Buildout Plan**

20 15. In recent years the Commission has approved continuation of TEP's buildout program
21 at a rate of \$28 million annually. In Decision No. 74165 (October 25, 2013), the Commission
22 approved \$28 million in buildout program funding for 2014, with a further \$12 million in 2015 for the
23 Fort Huachuca project. TEP indicates in its current filing that it will no longer seek approval of
24 buildout funding through the REST implementation plan, but rather will seek recovery of the cost of
25 future utility-scale renewable energy projects via traditional cost recovery means. The table below
26 shows the costs anticipated to be recovered through the REST budget in 2015-2017.

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Line Item	2015	2016	2017
Carrying Costs	\$3,826,682	\$4,832,385	\$4,519,820
Book Depreciation	\$3,550,407	\$4,438,532	\$4,438,532
Property Tax Expense	\$208,871	\$392,960	\$451,492
Operations and Maintenance	\$436,570	\$517,167	\$532,682
Total	\$8,022,529	\$10,181,044	\$9,942,526

Energy Storage Solicitation

16. TEP indicates in its application that it plans to issue a solicitation in 2015 for up to 10 MW of storage capacity. TEP indicates that as the grid experiences higher penetration levels of intermittent and variable renewable generation, the need for flexible resources such as energy storage will be needed to address a variety of operational issues. TEP seeks Commission guidance on how cost recovery for such a project would occur and specifically what the Commission views as the preferred cost recovery mechanism for costs for such a project at this time.

17. TEP believes that current allowable Federal Energy Regulatory Commission ("FERC") accounts for TEP's Purchased Power and Fuel Adjustment Clause ("PPFAC") would not provide for recovery of storage costs through that mechanism and that it is not clear whether such costs could be recovered through the REST surcharge. TEP's filing also indicates that the cost recovery mechanism could depend on the nature of the storage resource.

18. In discussions with TEP, the Company has indicated that it is likely, if it moved forward with an energy storage project as a result of the solicitation, that the Company would not build and operate a facility, but would rather enter into a long term purchased power type of agreement to contract with an entity for energy storage services, given the Company's lack of experience with such facilities.

19. Given these circumstances, Staff believes it is reasonable to provide guidance on what would be the preferred cost recovery method at this time, recognizing that the issue could be revisited in the future when the results of the solicitation are known and other relevant information may become available. In addition, Staff notes that the services TEP seeks in its energy storage solicitation are identical to the services in its already approved DR program. Staff further notes that TEP is currently recovering the costs of its DR program through its PPFAC, although Staff recommended

1 recovery through TEP's DSM surcharge. Therefore, approving recovery of the energy storage
2 solicitation through its PPFAC would be consistent with this. Given that TEP indicates that the
3 energy storage facility could be a power purchase-type agreement, Staff recommends cost recovery
4 through the PPFAC be considered the preferred cost recovery method, for now.

5 20. Staff believes it is reasonable to discuss this issue further in the future when TEP
6 brings further information before the Commission regarding its proposed energy storage solicitation.

7 21. Staff further recommends that TEP, as part of its 2016 REST plan filing, report the
8 results of the energy storage solicitation to the Commission, including results of the solicitation,
9 estimated customer impacts if recovered through the PPFAC, and other information TEP believes is
10 relevant to the Commission's consideration of the energy solicitation results.

11 **Utility-Owned Distributed Generation Program**

12 22. TEP's application seeks Commission approval of a new program under which TEP
13 would own residential customer-sited DG. To date, residential customer-sited DG has entailed either
14 the customer owning the system or the system being installed under some kind of lease arrangement.

15 23. For TEP the Commission had previously approved a non-residential DG program, the
16 Bright Roofs program that is similar to the Company's current proposal. The Bright Roofs program
17 allowed TEP to own DG on non-residential rooftop locations and count such DG toward its non-
18 residential DG REST requirements, though there was little activity under the Bright Roofs program
19 and the program was subsequently discontinued.

20 24. TEP proposes to spend up to \$10 million under this program to install approximately
21 3.5 MW of utility-owned residential rooftop DG, based on an expected installed cost of \$2.85 to \$3.00
22 per watt.¹ Assuming the typical system is installed under this program is approximately 6 kW, the
23 program would enable the installation of roughly 600 residential DG systems. Given TEP's current
24 installation rate, with TEP reporting more than 500 applications in the month of September 2014,
25

26 _____
27 ¹ TEP's expected capital cost closely approximates APS's estimated installed costs under APS's newly
28 proposed utility-owned residential DG program. APS estimates installed cost ranging from \$2.85 to
\$3.50 per watt.

1 installations under this program are likely to represent a relatively small segment of the residential DG
2 market in TEP's service territory.

3 25. Residential customers who participate in the program would enter into a contract with
4 TEP to allow the Company to install a rooftop DG system on their roof. TEP would install a system
5 that approximates the annual energy usage of the given customer in question. The customer would
6 pay a fixed amount each month, approximately \$99 for a typical residential customer, equivalent to
7 what they are currently paying, for the life of the system (\$93.00 plus taxes and surcharges).

8 26. The life of the system would be 25 years, based upon the manufacturer's warranty.
9 The contract between TEP and the customer would include a buyout provision if the customer
10 wished to buy the system at some point. If annual average monthly consumption rose or fell by more
11 than 15 percent, the customer's fixed charge would be adjusted accordingly. TEP would prescreen
12 rooftops so that installations under this program would only target roofs in good condition.

13 27. If a home with a utility-owned DG system was sold, the system would stay with the
14 home and the new owner/resident of the home would assume responsibilities under the contract the
15 original owner had signed with TEP (assuming the customer does not exercise the option to buy the
16 system).

17 28. TEP is not seeking any cost recovery through the 2015 REST plan and would seek
18 recovery of expenditures under this program in TEP's next rate case. The prudence of TEP's
19 expenditures under this program would be reviewed in TEP's next rate case. TEP would credit back
20 revenue beyond the customer charge (\$10) and remaining fixed cost (\$30.80) to pay for the capital
21 costs of the systems. The table below shows a comparison provided by TEP of what a typical
22 customer pays under different scenarios.

	Existing Customer	Net-Zero Customer	Customer under Proposed TEP Program
Customer Charge	\$10.00	\$10.00	
Delivery Margin	\$20.20		
Fixed Costs	\$30.80		
Fuel	\$32.00		
Monthly Payment			\$93.00

1 2 3 Total Monthly Payment (absent taxes and surcharges)	\$93.00	\$10.00	\$93.00
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4 29. TEP's program would enable the Company to retain the revenue stream from a
5 customer who has rooftop solar in a way that does not occur with net-metering. Because of this,
6 TEP's proposal may ameliorate the contentious issue of cost-shifting between rooftop and non-
7 rooftop customers. Customers taking service under TEP's proposal would be paying costs through
8 the fixed charge that otherwise would be passed to other customers through the lost fixed cost
9 recovery ("LFCR") charge.

10 30. TEP would retain the RECs from systems under this program and these RECs would
11 count toward REST compliance for TEP, though the volume of RECs from the proposed program
12 would not be sufficient for TEP to maintain compliance with the REC requirements in a post-
13 incentive environment.

14 31. TEP would contract with installers to install and maintain systems under the program.
15 While TEP's filing references local installers, all vendors who meet TEP's specified requirements
16 (discussed below) will be eligible to participate in the solicitation. TEP will use a traditional vendor
17 solicitation process to select the installers. The solicitation will outline vendor product, installation,
18 financial, and experience requirements, require licenses and permits, performance and warranty
19 expectations, and costs.

20 32. TEP will enter into Master Service Agreements with selected installers as it does with
21 other third party contractors. TEP will target installations to areas on its grid where DG will provide
22 the most benefit to utility operations. TEP believes that this program will inherently provide access to
23 DG to customers who were unable to install DG in the past due to financial constraints and/or low
24 credit scores.

25 33. A benefit to TEP of the program is that it would be able to use its new systems
26 communications network it is currently developing to allow TEP to communicate with and control
27 the inverters on systems installed under the proposed program to provide benefits to the grid, such as
28 voltage and frequency support.

1 34. TEP's proposal would provide TEP customers with a new option for installing
2 rooftop solar that is different than options available now and this option would widen the pool of
3 possible participants to some customers who were previously not able to pursue rooftop solar.

4 35. From information Staff has reviewed, Staff does not believe that the program will fully
5 pay for itself, but rather it appears that it would significantly lessen the cost shift to non-participating
6 ratepayers in comparison with a customer who currently purchases or leases a rooftop system. There
7 are many uncertainties regarding how the program would fare in the renewable energy marketplace in
8 comparison to other existing methods of rooftop DG deployment. The Commission's ability to
9 review the prudence of this program in TEP's next rate case provides the Commission with the ability
10 to protect ratepayer interests.

11 36. Staff believes that TEP's proposal should be viewed as a pilot program that will test a
12 new method of rooftop DG delivery and should be reviewed in the future and modified as necessary,
13 in addition to TEP's future rate proceedings when the prudence of the program may be considered.

14 37. In essence TEP's proposal is a way of treating company-owned rooftop DG in a
15 manner similar to traditional generation resources, which are constructed and then put into rate base
16 in future rate proceedings after review by the Commission.

17 38. While it is anticipated that the program's prudence and related matters would be
18 considered in future TEP rate proceedings, Staff believes that it would be appropriate for TEP to
19 report on its experience with the program as part of each future REST plan filing. Thus, Staff
20 recommends that TEP include a discussion of the program in its annual REST plan filings, beginning
21 with the 2016 REST plan to be filed in July 2015, as long as the program continues to exist.

22 39. Staff recommends approval of TEP's proposed program for utility-owned residential
23 rooftop DG, with a limit on expenditures of \$10 million.

24 40. In discussions with TEP the Company has indicated that it believes that larger scale
25 distributed generation facilities located in TEP's grid, possibly 1 MW or so, and structured similarly to
26 TEP's proposed Company-owned DG program, could provide most of the benefits of rooftop DG at
27 a reduced cost.

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1 41. Staff believes that this option, or a purchased power agreement for such a facility is
 2 worthy of further exploration and recommends that TEP, as part of its 2016 REST plan filing, include
 3 a report on the feasibility, costs, benefits, and other aspects of these options and if TEP wishes, an
 4 implementation proposal, as part of TEP's REST activities. TEP's analysis should include a
 5 comparison of these options with company-owned and customer-owned distributed generation
 6 options.

7 **2013 Funds Carried Forward to 2015 REST Budget**

8 42. TEP's filing reflects the carry-forward of \$6,826,415 in unspent funds from TEP's
 9 2013 REST budget. The table below accounts for what line items of TEP's 2013 REST budget those
 10 funds came from.

2013 Tariff Revenue	-\$1,588,251
Lower Cost Purchased Renewable Energy	\$5,141,428
Customer Sited Distributed Renewable Energy	\$2,427,555
Labor and Administration	\$792,296
Other Budget Items	\$18,633
Total Unspent 2013 REST funds	\$6,826,415

16 43. The TEP and Staff REST budget proposal discussed herein reflect this carry-forward
 17 of unspent 2013 REST funds which reduce the amount of money required to be recovered through
 18 the 2015 REST surcharge.

19 **Incentive Levels**

20 44. Consistent with the Commission approved 2014 REST plan and budget, the only
 21 incentive money proposed for 2015 is a continuation of the solar water heater program as discussed
 22 above. The proposed budget also includes performance-based incentive funds to meet previously
 23 made commitments.

24 45. Staff notes that TEP projects it will not have enough RECs to achieve residential DG
 25 compliance for 2015. Even if the Commission approves TEP's proposal to own residential rooftop
 26 DG systems, TEP still expects to fall short of residential DG REC requirement in 2015. Staff notes

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1 the irony of this in light of the fact that TEP has experienced unprecedented levels of DG installations
2 in 2014.

3 Proposed TEP and Staff Budgets

4 46. Staff has reviewed the budget proposal contained in TEP's proposed 2015 REST plan
5 and agrees with TEP's proposed budget. The table below summarizes the budget being proposed by
6 TEP and Staff.

Budget Components	2014 Approved Budget	2015 TEP and Staff Proposal
<i>Purchased Renewable Energy</i>		
Above market cost of conventional generation	\$25,481,208	\$22,971,774
TEP Owned	\$5,230,122	\$8,022,529
Subtotal	\$30,711,330	\$30,994,303
<i>Customer Sited Distributed Renewable Energy</i>		
Residential PV UFI	\$0	\$0
Non-Residential PV UFI	\$0	\$0
Non-Residential PBI On-Going Commitments	\$7,944,363	\$7,214,196
Residential/Non-residential Solar Water Heating UFI	\$60,000	\$60,000
Meter Reading	\$35,363	\$35,363
Customer Education and Outreach	\$100,000	\$100,000
Subtotal	\$8,139,726	\$7,409,559
<i>Technical Training</i>		
Internal and Contractor Training	\$75,000	\$85,000
Subtotal	\$75,000	\$85,000
<i>Information Systems</i>		
Subtotal	\$100,000	\$100,000
<i>Metering</i>		
Subtotal	\$118,204	\$501,680
<i>Labor and Administration</i>		
Internal Labor	\$339,103	\$468,442
External Labor	\$300,710	\$302,401
Materials, Fees, Supplies	\$60,000	\$60,000
AZ Solar Website	\$4,000	\$4,000
Subtotal	\$703,813	\$834,843
<i>Research and Development</i>		
Energy Storage and Grid Study		\$38,000
PV Degradation Testing and Analysis	\$53,000	\$50,000
Solar Test Yard Maintenance Equipment	\$25,000	\$50,000
Solar and Wind Forecast	\$182,000	\$100,000

1	Integration Portal		
	Dues and Fees	\$15,000	\$15,000
2	Subtotal	\$275,000	\$253,000
	Total Spending	\$40,123,073	\$40,178,385
3	Carryover of Previous Year's Funds	-\$6,521,430	-\$6,826,416
4	Total Amount for Recovery	\$33,601,643	\$33,351,969

6 Recovery of Funds Through 2015 REST Charge

7 47. TEP's proposed caps and per kWh charge are designed to recover TEP's proposed
 8 spending and recovery levels in 2015 and Staff's proposed caps and per kWh charge are designed to
 9 recover Staff's proposed budget of \$40.1 million and recovery level of \$33.5 million. Given the
 10 relatively similar amount to recover in 2015 in comparison to 2014, TEP is proposing to not change
 11 the class caps or surcharge level.

12 48. Staff believes that, given TEP's tendency to have funds left over at the end of each
 13 calendar year and that the difference, while not enormous, is still a significant amount of money, the
 14 residential customer cap should be reduced to reflect the lower amount to be recovered through the
 15 REST surcharge in 2015 under the TEP/Staff budget proposal. Staff therefore recommends adjusting
 16 the residential class cap downward to \$3.78 to reflect the slightly lower amount to recover in 2015.

17 49. The table below shows the proposed surcharge per kWh for the TEP and Staff
 18 options as well as the proposed caps under each option, in comparison to what is currently in effect
 19 for 2014.

	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
21 REST Charge (per kWh)	\$0.008	\$0.008	\$0.008
22 <i>Class Caps</i>			
23 Residential	\$3.83	\$3.83	\$3.78
24 Small General Service (Small Commercial)	\$100.00	\$100.00	\$100.00
25 Large General Service (Large Commercial)	\$1,015.00	\$1,015.00	\$1,015.00
26 Industrial and Mining	\$8,000.00	\$8,000.00	\$8,000.00
27 Lighting	\$100.00	\$100.00	\$100.00

50. The cost recovery by customer class for the approved 2014 REST plan and estimates for the TEP and Staff options for the 2014 REST plan are shown in the table below. For comparison purposes, the table below also shows the projected MWH sales by customer class for 2014.

	2013 Actual Sales (MWH)	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residential	3,836,078 (42.2%)	\$14,587,641 (43.4%)	\$14,779,396 (44.1%)	\$14,632,163 (43.9%)
Small General Service	2,122,981 (23.3%)	\$10,304,762 (30.6%)	\$10,244,784 (30.6%)	\$10,244,784 (30.7%)
Large General Service	1,124,481 (12.4%)	\$5,626,584 (16.7%)	\$5,727,369 (17.1%)	\$5,727,369 (17.2%)
Industrial and Mining	1,969,950 (21.7%)	\$2,880,000 (8.6%)	\$2,496,000 (7.5%)	\$2,496,000 (7.5%)
Lighting	32,350 (0.4%)	\$234,711 (0.7%)	\$256,281 (0.8%)	\$256,281 (0.8%)
Total	9,085,840	\$33,633,698	\$33,503,830	\$33,356,598

51. The table below shows the contribution, per kWh consumed, for each customer class (projected class cost recovery divided by projected class kWh sales). The table thus provides a comparison of the relative contribution to REST funding by each customer class on a per kWh basis.

Contribution by Customer Class (per kWh)	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residential	\$0.0038	\$0.0039	\$0.0038
Small Commercial	\$0.0048	\$0.0048	\$0.0048
Large Commercial	\$0.0048	\$0.0051	\$0.0051
Industrial/ Mining	\$0.0015	\$0.0013	\$0.0013
Lighting	\$0.0063	\$0.0008	\$0.0008

52. The table below shows the average REST charge by customer class as well as the percentage of customers at the cap for each customer class.

	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
Residential - Average Bill	\$3.25	\$3.22	\$3.19
Small Commercial - Average Bill	\$18.94	\$20.77	\$20.77

1	Large Commercial - Average Bill	\$778.98	\$779.66	\$779.66
2	Industrial and Mining - Average Bill	\$8,000	\$8,000	\$8,000
3				
4	Lighting - Average Bill	\$15.49	\$11.71	\$11.71
5	Residential - Percent at Cap	72.0%	64.2%	64.2%
6	Small Commercial - Percent at Cap	8.4%	6.5%	6.5%
7	Large Commercial - Percent at Cap	46.9%	45.0%	45.0%
8	Industrial and Mining - Percent at Cap	100.0%	99.0%	99.0%
9				
10	Lighting - Percent at Cap	0.7%	0.5%	0.5%
11				

12 53. Estimated customer bill impacts for various monthly consumptions are shown in the
13 table below.

14	Example Customer Types	kWh / mo.	2014 Approved	2015 TEP Proposal	2015 Staff Proposal
15	Residence Consuming	400	\$3.20	\$3.20	\$3.20
16	Residence Consuming	850	\$3.83	\$3.83	\$3.78
17	Residence Consuming	2,000	\$3.83	\$3.83	\$3.78
18	Dentist Office	2,000	\$16.00	\$16.00	\$16.00
19	Hairstylist	3,900	\$31.20	\$31.20	\$31.20
20	Department Store	170,000	\$100.00	\$100.00	\$100.00
21	Mall	1,627,100	\$1015.00	\$1015.00	\$1015.00
22	Retail Video Store	14,400	\$100.00	\$100.00	\$100.00
23	Large Hotel	1,067,100	\$1015.00	\$1015.00	\$1015.00
24	Large Building Supply	346,500	\$1015.00	\$1015.00	\$1015.00
25	Hotel/Motel	27,960	\$100.00	\$100.00	\$100.00
26	Fast Food	60,160	\$100.00	\$100.00	\$100.00
27	Large High Rise Office Bldg	1,476,100	\$1015.00	\$1015.00	\$1015.00
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1	Hospital (< 3 MW)	1,509,600	\$1015.00	\$1015.00	\$1015.00
2	Supermarket	233,600	\$1015.00	\$1015.00	\$1015.00
3	Convenience Store	20,160	\$100.00	\$100.00	\$100.00
4	Hospital (> 3 MW)	2,700,000	\$8,000.00	\$8,000.00	\$8,000.00
5	Copper Mine	72,000,000	\$8,000.00	\$8,000.00	\$8,000.00

7 Staff Recommendations

8 54. Staff recommends that the Commission approve the Staff budget option for the 2015
 9 REST plan, reflecting a REST surcharge of \$0.00800 per kWh, and related caps of \$3.78 for the
 10 residential class, \$100.00 for the small general service class, \$1,015.00 for the large general service
 11 class, \$8,000.00 for the industrial and mining class, and \$100.00 for the lighting class. This includes
 12 total spending of \$40,178,385 and a total amount to be recovered through the REST surcharge of
 13 \$33,351,969.

14 55. Staff further recommends that solar hot water heating continue to be funded at the
 15 \$60,000 level, with an incentive level of \$0.40 per kWh in 2015.

16 56. Staff further recommends that the Commission indicate that its current preference for
 17 cost recovery of a project resulting from TEP's energy storage solicitation is through the PPFAC,
 18 subject to further consideration in the future.

19 57. Staff further recommends that TEP file, as part of its 2016 REST plan proposal,
 20 information on the energy storage solicitation, including results of the solicitation, and other
 21 information TEP believes is relevant to the Commission's consideration of the energy solicitation
 22 results.

23 58. Staff further recommends approval of TEP's proposal for utility-owned residential
 24 distributed generation program, with a limit on expenditures of \$10 million.

25 59. Staff further recommends that TEP, as part of its 2016 REST plan filing, include a
 26 report on the feasibility, costs, benefits, and other aspects of larger scale distributed generation
 27 options, either company-owned or through purchased power agreements, and if TEP wishes, a
 28 proposal to implement one of these options as part of TEP's REST activities. TEP's analysis should

1 include a comparison of these options with company-owned and customer-owned distributed
2 generation options.

3 60. Staff further recommends that TEP include a discussion of the utility-owned
4 residential distributed generation program in its annual REST plan filings, beginning with the 2016
5 REST plan to be filed in July 2015, as long as the program contuse to exist.

6 61. Staff further recommends that TEP file the REST-TS1, consistent with the Decision
7 in this case, within 15 days of the effective date of the Decision.

8 CONCLUSIONS OF LAW

9 1. Tucson Electric Power Company is an Arizona public service corporation within the
10 meaning of Article XV, Section 2 of the Arizona Constitution.

11 2. The Commission has jurisdiction over Tucson Electric Power Company and over the
12 subject matter of the application.

13 3. The Commission, having reviewed the application and Staff's Memorandum dated
14 November 3, 2014, concludes that it is in the public interest to approve Tucson Electric Power
15 Company's 2015 Renewable Energy Standard and Tariff Implementation Plan, as discussed herein.

16 ORDER

17 IT IS THEREFORE ORDERED that the Staff budget option for the Tucson Electric Power
18 Company's 2015 REST plan, reflecting a REST surcharge of \$0.00800 per kWh, and related caps of
19 \$3.78 for the residential class, \$100.00 for the small general service class, \$1,015.00 for the large
20 general service class, \$8,000.00 for the industrial and mining class, and \$100.00 for the lighting class,
21 be and hereby is approved. This includes total spending of \$40,178,385 and a total amount to be
22 recovered through the REST surcharge of \$33,351,969.

23 IT IS FURTHER ORDERED that the solar hot water heating program continue to be funded
24 at the \$60,000 level, with an incentive level of \$0.40 per kWh in 2015

25 IT IS FURTHER ORDERED that the Commission's current preference for cost recovery of
26 a project resulting from Tucson Electric Power Company's energy storage solicitation is through the
27 PPFAC, subject to further consideration in the future.

28 ...

1 IT IS FURTHER ORDERED that Tucson Electric Power Company file, as part of its 2016
2 REST plan proposal, information on the energy storage solicitation, including results of the
3 solicitation, and other information Tucson Electric Power Company believes is relevant to the
4 Commission's consideration of the energy solicitation results.

5 IT IS FURTHER ORDERED that Tucson Electric Power Company's proposal for utility-
6 owned residential distributed generation program, with a limit on expenditures of \$10 million, be and
7 hereby is approved.

8 IT IS FURTHER ORDERED that Tucson Electric Power Company, as part of its 2016
9 REST plan filing, shall include a report on the feasibility, costs, benefits, and other aspects of larger
10 scale distributed generation options, either company-owned or through purchased power agreements,
11 and if Tucson Electric Power Company wishes, an implementation proposal, as part of their REST
12 activities. Tucson Electric Power Company's analysis should include a comparison of these options
13 with company-owned and customer-owned distributed generation options.

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1 IT IS FURTHER ORDERED that Tucson Electric Power Company include a discussion of
2 the utility-owned residential distributed generation program in its annual REST plan filings, beginning
3 with the 2016 REST plan to be filed in July 2015, as long as the program continues to exist.

4 IT IS FURTHER ORDERED that Tucson Electric Power Company file the REST-TS1 and
5 Residential Solar-Company-owned Systems Tariff, consistent with the Decision in this case, within 15
6 days of the effective date of the Decision.

7
8 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

9
10 _____
11 CHAIRMAN

COMMISSIONER

12
13 _____
14 COMMISSIONER

COMMISSIONER

COMMISSIONER

15 IN WITNESS WHEREOF, I, JODI JERICH, Executive
16 Director of the Arizona Corporation Commission, have
17 hereunto, set my hand and caused the official seal of this
18 Commission to be affixed at the Capitol, in the City of
19 Phoenix, this _____ day of _____, 2014.

20 _____
21 JODI JERICH
22 EXECUTIVE DIRECTOR

23 DISSENT: _____

24 DISSENT: _____

25 SMO:RGG:sms\CHH
26
27
28

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