

E-01933A-15-0100



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ARIZONA CORPORATION COMM

UTILITY COMPLAINT FORM

Investigator: Tom Davis

Priority: Respond Within Five Days

Opinion No. 2015 - 121928

Date: 4/14/2015

Complaint Description: 08A Rate Case Items - Opposed
N/A Not Applicable

Complaint By: First: Chardon Last: Stuart

Account Name: Chardon Stuart

Street:

City: Scottsdale

State: AZ Zip: 85258

Work: (000) 000-0000

is: Cellular

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Utility Company: Tucson Electric Power Company

Division: Electric

Contact Name: C

Arizona Corporation Commission
DOCKETED

APR 14 2015

Nature of Complaint:

DOCKET # E-01933A-15-0100 - ELECTRIC

DOCKETED BY

4/14/15: Email

First, TEP fails to account for the benefits that direct generation solar can provide to the grid. TEP uses unrecovered fixed costs to measure the cost-shift to non-DG customers that result from the current metering rules and traditional rate design. But unrecovered fixed costs only include costs that have actually occurred. It does not include any costs that may have been avoided. There are good reasons to think that the use of direct generation solar has actually lowered TEP's grid operation and maintenance costs. Additionally, TEP's proposed Renewable Credit Rate is not calculated to reflect the unique benefits of direct generation solar power. Not all sources of "renewable energy" are similarly situated. Wind is cheaper than solar. Moreover, the marginal value of utility-scale power is less than the marginal value of direct generation power. The price of utility-scale power typically includes transmission costs. Directly generated power doesn't incur these costs before consumption.

End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

4/14/15: Entered for the record and docketed

End of Comments

ORIGINAL

Date Completed: 4/14/2015

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