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BEFORE THE ARIZONA CORPORATION COMMISSION

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6   **DOUG LITTLE, COMMISSIONER**

7

8   IN THE MATTER OF THE APPLICATION   DOCKET NO. E-01345A-13-0248
9   OF ARIZONA PUBLIC SERVICE
    COMPANY FOR APPROVAL OF NET
10 METERING COST SHIFT SOLUTION.

11
                    Arizona Competitive Power Alliance
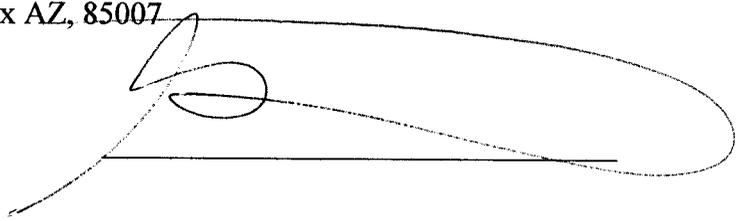12

13   **Reply Brief on Interim Net Metering Solution**

14 The AzCPA's position in this case is closely aligned with those of both RUCO and Staff. On the

15 legal issue, we agree that the ACC has the authority to adjudicate the current APS filing outside of

16 the bounds of a rate case. On the policy issue, we agree with Staff that the ACC would have many

17 more options if it chose to handle the issues in a rate case. Indeed, we believe that the ACC will

18 ultimately choose to deal with many of the fundamental issues that APS has raised in the context of a

19 full rate case. However, we believe that the RUCO argument on timing trumps the Staff argument

20 on flexibility. If APS does indeed file a rate case in the 2nd quarter of 2016, the final outcome of that

21 case would likely be decided in the 3rd quarter of 2017. That is simply too long to wait. The AzCPA

22 believes that the ACC should act on the APS filing by adjusting the LFCR now—and possibly in the

23 summer of 2016 as well—while working on a comprehensive solution that can be implemented at

24 the end of the company's next rate case in 2017.

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RESPECTFULLY SUBMITTED this 2nd day June, 2015.

By: Greg Patterson, Of Counsel
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ORIGINAL and 13 copies of the
foregoing hand-delivered for filing
this 2nd Day of June, 2015

Docket Control
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