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DOCKET NO. E-01933A-15-0100

IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF A NEW NET-METERING TARIFF FOR FUTURE NET METERED CUSTOMERS AND A PARTIAL WAIVER OF THE COMMISSION'S NET METERING RULES

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Dear Chairman Bitter-Smith and Commissioners,

AZ CORP COMMISSION DOCKET CONTROL

We are owners of Net Zero Solar, a renewable energy installation company serving southern Arizona since 2009. Combined, our partners have over three decades of experience installing renewable energy systems in Arizona.

We were pleased to read Tucson Electric Power Company's June 19<sup>th</sup> motion to withdraw their proposal regarding net metering. As staff and many stakeholders noted in oral arguments, a rate case is the best place to discuss the pros and cons of renewable energy technologies. We look forward to this discussion, as we believe this will result in the best outcome for all stakeholders.

However, TEP's final paragraph in their June 19<sup>th</sup> filing is extremely troubling, as they state they intend to "propose that [the] modified net metering tariff apply to DG system applications submitted after 5pm on June 1, 2015." TEP has provided proposed new language for their interconnection application disclaimer.<sup>1</sup>

In effect, this language continues the unilateral freeze that TEP placed on the installation of customer-owned solar electric systems on June 1<sup>st</sup>, 2015. TEP customers who wish to install solar electric systems still do not have the opportunity to interconnect under the currently approved tariff without significant uncertainty. For small companies like ours, a continued artificial freeze will result in even more layoffs of personnel.

This seems to us to be regulation by proposal, outside the bounds of reason, and outside of proper commission oversight. TEP should not be able to hold hostage an entire industry until their planned rate case is completed.

We respectfully ask that you take action to clarify the removal of this arbitrary grandfather date. Any outcome of a rate case or other proceeding should be effective on the effective date of that rate case or other proceeding. Please allow small businesses like ours to continue to serve TEP customers who desire to own solar electric systems.

<sup>1</sup> Although not properly linked from TEP's website, the proposed interconnection application disclaimer is at [https://www.tep.com/doc/renewable/PV/tep\\_attachment\\_ab.pdf](https://www.tep.com/doc/renewable/PV/tep_attachment_ab.pdf).

Arizona Corporation Commission

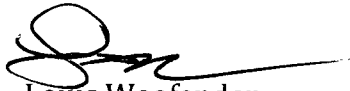
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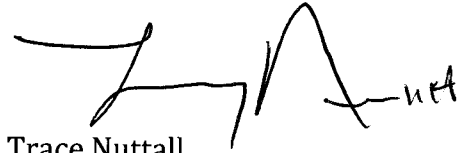
Sincerely,



Louis Woofenden  
Engineering Director/Owner



Chad Waits  
President



Trace Nuttall  
Owner/Manager

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