

E-01575A-15-0127



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ORIGINAL

**ARIZONA CORPORATION COMI
UTILITY COMPLAINT FORM**

Investigator: Carmen Madrid

Phone:

Fax:

Priority: Respond Within Five Days

Opinion No. 2015 - 122168

Date: 4/30/2015

Complaint Description: 19Y Net Metering
08A Rate Case Items - Opposed

First:

Last:

Complaint By: **Bob Spiczka**

Account Name: Bob Spikza

Home: (000) 000-0000

Street: n/a

Work: (000) 000-0000

City: n/a

CBR:

State: AZ Zip: 00000

is:

Utility Company: Sulphur Springs Valley Electric Cooperative, Inc.

Division: Electric

Contact Name:

Contact Phone:

Nature of Complaint:

*****OPPOSED*****DOCKET NO. E-01575A-15-0127*****

From: Bob Spiczka [mailto:
Sent: Friday, April 24, 2015 9:16 AM
To: Utilities Div - Mailbox
Subject:

To Whom it may concern:

Please see attached letter concerning Proposed Net Metering Changes written by Mr. Humphrey and an addendum that I have written.

Thank you for your consideration in advance.

Robert Spiczka

Arizona Corporation Commission

DOCKETED

APR 30 2015

Alan J. Humphrev

DOCKETED BY

Hereford, Arizona,

April 23, 2015

RE: SSVEC Petition to be Exempt from Net Metering Rules
Public comment
Docket No. E-01575A-15-0127

RECEIVED
2015 APR 30 P 3:08
ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

To Whom It May Concern:

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

SSVEC is petitioning to be exempt from some of the rules regarding net metering. They sent a newsletter (attached) to customers in mid April 2015. The newsletter is not dated, does not state a docket number for their petition or have any identifying information beyond the title of "Important Notice Sulphur Springs Valley Electric Cooperative Members. The newsletter does not specify from which rules they are requesting exemption. The proposed exemptions would affect solar installations installed or reserved after April 15, 2015.

I spoke with David Bane of SSVEC regarding this newsletter. While I agree with him that the current rate structure needs revision, I disagree with their current proposal and the underhanded way they are going about requesting it, explaining it, and trying to justify it.

The most worrisome aspect of their petition is to grandfather current solar owners for 20 years from April 15, 2015. Current solar owners should be grandfathered indefinitely. Nothing was said about a 20-year time frame for net metering when we bought our array. No, SSVEC is trying to change the rules retroactively. This is unfair to consumers that participated in the program as it was described when we made our purchase.

The way the request is described in the newsletter, the changes will affect those installing or requesting a reservation agreement after April 15, 2015. In my opinion, this is a reprehensible way to do business. In effect, they have requested to stop the clock on new installations even before they mailed the newsletter out to their customers (the docket was filed April 14, 2015). If the Corporation Commission grants their request, they should at least remove this caveat from the request and make it applicable to installations going forward from the date the request is granted. It would appear the SSVEC's request to stop the clock is two-fold: to give them the luxury of time while the Corporation Commission is considering this request; and to discourage future requests for reservation agreements. Putting the process in limbo retroactively is bound to discourage new connections while SSVEC's request is being considered.

I would hope the Corporation Commission carefully reads the newsletter and sees it for the self-serving propaganda that it is. It is full of distorted facts, and outright lies. For example:

- Page 2, What is SSVEC Asking For, states that SSVEC "pays residential solar unit owners our current retail rate of 12.6 cents per kilowatt-hour when they sell solar power to us". This is an outright lie. They pay us the wholesale rate of 3.07 cents in March or September when we true-up. During the year, we GIVE them the power we don't need when it is generated so they can SELL it to other rate payers at 12.6 cents. There is no purchase of solar power by SSVEC at 12.6 cents per kilowatt-hour.

- Page 2, first paragraph, right column tries to make the case that this is a case of affluent customers being subsidized by the poor customers. This point is made in one form or another in several places throughout the newsletter. This is inflammatory and also untrue. Customers need not be affluent to lease solar arrays, and the combination of decreasing equipment prices and low loan rates make solar power affordable to a wider range of customers. It would appear that SSVEC is using half-truths to try to influence the opinion of the non-solar customers (the majority of the customers) to bring their voice to bear against the solar generating customers.

- Page 3, top left paragraph states that it costs \$71.89 per month to "build and operate the physical system that brings power to your house". I would hope that the Corporation Commission takes a long hard look at the calculations that were used to arrive at this cost. It seems unreasonably high given the typical bills I paid before having a solar array.

A solar array is a significant investment. SSVEC has made repeated attempts to change the rules under which solar systems are built, operated, and paid for. This is not fair to the individuals that constructed systems believing that SSVEC would play by the rules that were in place at the time they installed the array.

If a change in the rate structure is necessary, then it should be changed fairly, with equity for all customers and SSVEC as well. It should also be based on factual, unbiased information, not the contents of this newsletter. It appears that this attempt to weasel out of net metering is just another effort to stop solar construction. Don't let it go forward in place of a meaningful restructuring of rates.

ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM

Sincerely,

Alan Humphrey

Robert Spiczka

Sierra Vista, Arizona,

April 24, 2015

RE: SSVEC Petition to be Exempt from Net Metering Rules
Public comment
Docket No. E-01575A-15-0127

To Whom It May Concern:

This is an addendum to Alan Humphrey's letter with the same subject dated April 23, 2015. (attached)

I agree with Mr. Humphrey's comments in his letter. The document titled "Important Notice to Sulphur Springs Valley Electric Cooperative Members" is emotionally charged with terms like "fair share", "not fair" and "subsidized". The notice says that SSVEC are pro-solar, but reading the rest of the notice does not back up that statement.

The "Important Notice," as Mr. Humphrey's has noted, cannot be right. Before I installed a solar system to my house, I had many bills that were less than \$71.89, which makes me suspect any other facts that are represented in the notice.

As mentioned in the notice, SSVEC doesn't generate electricity, it has to purchase the electricity and it costs the same whether it is 3 pm or 3 am. I would think that SSVEC's stand would be get electricity from any source that is available, and solar is available. The weather information gathered with the Smart Hub, and information generating capabilities of the solar systems that report via Net-metering, SSVEC has the information to predict how much electricity to purchase near real time.

As Mr. Humphrey's summary paragraph said don't change the current billing structure based on the information presented in this document titled "Important Notice to Sulphur Springs Valley Electric Cooperative Members."

Sincerely,

Robert Spiczka
End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

Opinion noted and filed in Docket No. E-01575A-15-0127. closed
End of Comments

ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM

Date Completed: 4/30/2015

Opinion No. 2015 - 122168
