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**BEFORE THE**  
**ARIZONA CORPORATION COMMISSION**

IN THE MATTER OF THE APPLICATION ) DOCKET NO. E-01933A-15-0100  
OF TUCSON ELECTRIC POWER )  
COMPANY FOR (1) APPROVAL OF A NET )  
METERING TARIFF AND (2) PARTIAL )  
WAIVER OF THE NET METERING ) **BRIEF**  
RULES. )  
)  
)  
)

The Arizona Solar Deployment Alliance (“ASDA”), in accordance with the April 28, 2015 Procedural Order, hereby responds to whether Tucson Electric Company’s (“TEP”) request in the above captioned docket should be heard in a rate case.

**BACKGROUND**

TEP, in its March 25, 2015 application, asked the Arizona Corporation Commission (“Commission”) to 1) approve a net metering tariff for future net metered members and 2) approval a partial waiver of the Commission’s net metering rules.<sup>1</sup> Commission Staff filed a Request for Procedural Order on April 14, 2015 and recommended that TEP withdraw its

Arizona Corporation Commission  
**DOCKETED**

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*RC*

<sup>1</sup> Application at 1.

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1 Application so that the issue could be heard in a rate case. A procedural conference was held and  
2 a subsequent procedural order was issued that set out a briefing schedule and oral argument time.

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4 NEW NET METERING TARIFF AND WAIVER OF THE RULES

5 As stated above, TEP's application asks for a new net metering tariff that would provide  
6 monthly bill credits for excess energy at a "renewable credit rate" rather than the current retail  
7 rate.<sup>2</sup> This new tariff requires a waiver of the net metering rules because the current rules do not  
8 contemplate crediting customers at that rate.<sup>3</sup> This application is very similar to TRICO's  
9 application. Both TRICO and TEP are very different from APS' recent net metering decision  
10 and current application. ASDA fully briefed the differences between APS' situation and TRICO  
11 situation in the TRICO docket and would incorporate that argument here.

12  
13 The best place to address the issues raised by TEP is in a general rate case. For the first  
14 time, TEP is asking for a new rate design for DG customers. More importantly for this  
15 Commission, significant changes to rate design, like TEP's proposal, should be discussed and  
16 resolved in rate cases because there are more options available for the Commission to discuss  
17 and utilize to resolve the concerns of the utility.

18 ASDA believes it is in the public interest to have this matter heard in the context of a  
19 general rate case.

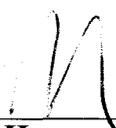
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25 <sup>2</sup> Id. at 6 and 7.

26 <sup>3</sup> Id. at 8.

1 CONCLUSION

2 ASDA respectfully requests that the Commission not hear TEP's request to change the  
3 net metering tariff and any potential for a rule waiver until TEP's next general rate case.  
4

5  
6 RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of May, 2015  
7

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17 copies filed on May 15, 2015 with:

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