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BEFORE THE ARIZONA CORPORATION COMMISSION

2015 SEP -4 P 1:28

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AZ CORP COMMISSIO  
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION  
OF ARIZONA PUBLIC SERVICE  
COMPANY FOR APPROVAL OF NET  
METERING COST SHIFT SOLUTION.

DOCKET NO. E-01345A-13-0248

**Arizona Competitive Power Alliance  
Comments on Scope of Proceeding**

The scope of this proceeding should be defined more by what it EXCLUDES than by what it INCLUDES. This hearing should not be used as a vehicle to answer the broad policy questions posed by the Generic Docket nor should it provide a forum to debate the intricacies of Rate Design. Each of those topics already have a forum that is appropriate to their scope and complexity. The scope of the Net Metering Hearing should be limited to answering the question that is inherent in Arizona Public Service's original filing:

"Is a \$3.00 per kW per month charge reasonable for new DG customers?"

Or, to be more precise, the question should be phrased this way:

"Is a \$3.00 per kW per month charge STILL reasonable for new DG customers?"

Adding the word "still" acknowledges that in Order 74202 the ACC already decided this question in the affirmative. (See Order 74202 Paragraph 85.) Clearly the scope of the proceeding to reaffirm the findings of Order 74202 should be narrower than the scope of the proceeding used to originate those findings.

Arizona Corporation Commission

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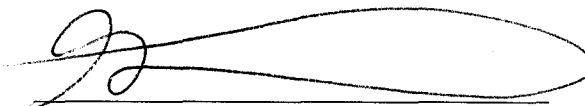
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1 The AzCPA proposes that parties be given a chance to refresh or augment the filings that  
2 they presented in the proceeding that led to Order 74202 and that new parties be given the  
3 opportunity to submit filings to the record as well. The Commission should then provide the parties  
4 with adequate time to file responses and once those rounds are complete, the Commission can take  
5 the time it needs to review the filings and schedule an Open Meeting in which parties can present  
6 their arguments and respond to questions. This approach recognizes the narrow scope of the  
7 question presented, avoids undue expansion into policy considerations covered by other dockets and  
8 allows parties the opportunity to both present their cases and respond to other party's cases. This  
9 process will protect the rights of the parties and ensure that the Commissioners have the information  
10 and time they need to determine if the conclusions they reached in Order 74202 should indeed be  
11 reaffirmed.  
12  
13  
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20 RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of September, 2015

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Docket Control

ARIZONA CORPORATION COMMISSION  
1200 West Washington  
Phoenix, Arizona 85007

COPY of the foregoing Sent Electronically to Parties of Record.

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