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Arizona Corporation Commission

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Attorneys for Intervenor-Applicants
IBEW Locals 387 and 769

**BEFORE THE ARIZONA
CORPORATION COMMISSION**

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

Docket No. E-01345A-13-0248

**INTERVENOR-APPLICANTS
IBEW LOCALS 387 AND 769'S
COMMENTS CONCERNING
SCOPE OF THE PROCEEDINGS**

In response to the Commission Legal Division's Notice of Opportunity to Provide Comments Concerning Scope of the Proceedings dated August 20, 2015, Local Unions 387 and 769 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 387" and "IBEW Local 769") (collectively, "the IBEW Locals"), hereby submit the following comments for the Commission's consideration.

The IBEW Locals submit that the scope of the proceedings in this matter should focus on, and be limited to, whether and to what extent the Lost Fixed Cost Recovery ("LFCR") Adjustment should be reset for residential rooftop solar customers. In examining this broader issue, it will be necessary to determine: (1) the existence of an under-recovery of costs *vis-à-vis* rooftop solar customers based on their use of the grid and electric service; and (2) whether APS's proposal represents a reasonable reset and an interim cost-shift solution that addresses the disparity in cost recovery between residential solar and non-solar customers in a manner consistent with the principle of gradualism.

The IBEW Locals look forward to participating in this discussion and in the

1 proceedings contemplated by the Commission in Decision No. 75251.

2 RESPECTFULLY SUBMITTED this 4th day of September, 2015.

3 LUBIN & ENOCH, P.C.

4 

5 Jarrett J. Haskovec
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7 Original and thirteen (13) copies
8 of IBEW Locals' Comments filed
9 this 4th day of September, 2015, with:

10 Arizona Corporation Commission
11 Docket Control Center
12 1200 West Washington Street
13 Phoenix, Arizona 85007-2996

14 Copies of the foregoing transmitted
15 electronically or mailed* this same date to
16 those identified on the attached service list
17 for this docket.

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