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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONER

11 **IN THE MATTER OF THE**)
12 **APPLICATION OF ARIZONA**)
13 **PUBLIC SERVICE COMPANY FOR**)
14 **APPROVAL OF NET METERING**)
15 **COST SHIFT SOLUTION.**)

DOCKET NO. E-01345A-13-0248
THE ALLIANCE FOR SOLAR
CHOICE'S RESPONSE TO APS'S
MOTION TO AMEND ORDER 75251

16 The Alliance for Solar Choice ("TASC") welcomes and supports Arizona Public Service's
17 ("APS") Motion to Amend Interlocutory Order (the "Motion to Amend") requesting that the
18 Commission modify Decision 75251 (the "Decision") for the purpose of removing consideration
19 of APS's request to quadruple its charge (the "Solar Surcharge") on those that utilize distributed
20 generation solar to reduce their energy usage. TASC consistently has argued that the existing Solar
21 Surcharge along with the proposed increase thereto are illegal and that the Arizona Constitution
22 prevents the Commission from granting APS's request outside a rate case.

23 As an alternative to moving forward with an increase of the Solar Surcharge, APS proposes
24 that the Commission move forward and carefully examine the costs of rooftop solar while
25 expressly prohibiting any examination of the benefits.¹ That APS can sincerely make such a
26 proposal is preposterous.

27 It would, for example, be irresponsible to blindly purchase an automobile while knowing
28 nothing but the sticker price, yet APS is suggesting the Commission evaluate rooftop solar without

¹ Motion to Amend at 4:8

Arizona Corporation Commission

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1 looking at anything other than the price. Just as a motor vehicle brings a value to the purchaser
2 that must weighed against the cost of the car, rooftop solar brings value to all Arizona ratepayers
3 that must be weighed against any costs before a policy decision can reasonably be reached. For
4 the same reason it would be folly to blindly evaluate a car purchase without knowing if there was
5 a working vehicle being offered in exchange for your money, it would be irrational to calculate
6 the costs of rooftop solar without regard for the benefits solar bestows on ratepayers.

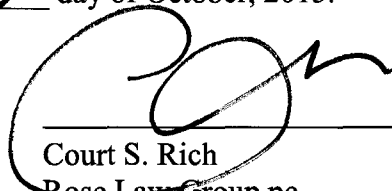
7 APS is correct that further study should move forward, as TASC repeatedly suggested
8 during the August 18, 2015, hearing in this docket, but that study should be a full and unbiased
9 look at costs *and* benefits of DG solar. TASC hereby reiterates its request that the Commission
10 join other states around the country in commissioning an independent third-party to perform a cost-
11 benefit analysis that fairly and impartially attempts to ascertain the true net benefit rooftop solar
12 bestows on Arizona ratepayers. TASC keeps open its offer to help fund such a study.

13 In addition, TASC believes that it would be arbitrary and capricious for the Commission
14 to endorse an investigation and consideration of costs without proper study of the corresponding
15 benefits of rooftop solar. While it may be in APS's best interests for the Commission to embark
16 on a one-sided examination of costs while prohibiting any consideration of the benefits of DG
17 solar, the Commission has the duty to act reasonably and fairly in determining just and reasonable
18 rates and charges.² A one-sided examination that prohibits the investigation of relevant and
19 important information is neither just nor reasonable.

20 In conclusion, TASC supports APS's Motion to Amend insofar as it would remove the
21 Solar Surcharge increase from further consideration outside a rate case but opposes any study or
22 proceeding moving forward that does not address both the costs *and* benefits of DG solar. TASC
23 repeats its offer to help fund an unbiased and independent third-party cost-benefit analysis of
24 rooftop solar.

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² See Arizona Constitution, Art. 15, Sec., 3.

1 Respectfully submitted this 5th day of October, 2015.

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7 **Original and 13 copies filed on**
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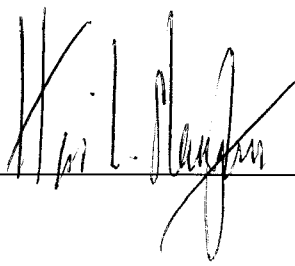
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