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April 15, 2016

Regarding: UNS Electric Rate Case Docket #E-04204A-15-0142

Dear Chairman Little and Members of the Arizona Corporation Commission:

The base position taken by UNS and other Arizona utilities that rooftop solar is, in any way, adding a load to their distribution system for which the utilities are receiving no or inadequate compensation is completely false. As an electrical engineer by degree, with over 40 years of experience, I can tell you they are attempting to push deliberately erroneous data by you, the ACC. Their proposition that rooftop solar customers create any additional system load is completely contrary to science. When my rooftop panels generate power beyond my needs, that power is immediately transferred to the power distribution network adjacent to my home, through my serving transformer, and then on to the needs of my adjacent neighbors, replacing power those neighbors would have drawn from generating facilities higher up the network, thus decreasing the load on the overall distribution system. That excess power, running through the meters of those adjacent neighbors, is billed to those neighbors by UNS as if it had come from their power generating facilities, thus providing UNS revenue equivalent to what they would have received from power-facility-generated product and reimbursing them for network load that did not actually happen. At night, or in higher demand seasons, UNS then provides me, pays me back, with power from their facilities in quantity equivalent to that power they earlier received from me and distributed to my neighbors. The network load and associated cost to distribute that pay back or net metering power is covered by the revenue UNS received from my neighbors for the power UNS received from me earlier and distributed to those neighbors.

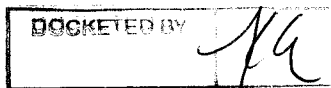
Talk to any electrical engineer not in the employment of UNS or otherwise biased, and you'll receive the same explanation. Better, call me (number below) and I'll willingly explain the matter to any of you. Approving the UNS proposal would be a huge step toward moving Arizona back into the stone age of renewable energy, and expose our state as one that, unlike many others, puts politics and influence ahead of logic and science.

Thank you,
Richard Grossman
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Arizona Corporation Commission

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