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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC, INC. FOR THE ESTABLISHMENT OF JUST AND REASONABLE RATES AND CHARGES DESIGNED TO REALIZE A REASONABLE RATE OF RETURN ON THE FAIR VALUE OF THE PROPERTIES OF UNS ELECTRIC, INC. DEVOTED TO ITS OPERATIONS THROUGHOUT THE STATE OF ARIZONA AND FOR RELATED APPROVALS.

Docket No. E-04204A-15-0142

Arizona Corporation Commission
DOCKETED
MAY 11 2016
DOCKETED BY

POST-HEARING REPLY BRIEF

OF

THE RESIDENTIAL UTILITY CONSUMER OFFICE

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I. Introduction

In UNS Electric's ("Company") Initial Post-Hearing Brief, the Company significantly changed their rate design position. The Company has returned to their opening position, filed in their rate case application. The Residential Utility Consumer Office ("RUCO") applauds the Company for their willingness to recognize that this rate case is not the appropriate case, for universal three-part rates applied to all residential ratepayers. While the Company's change in position should be commended, RUCO is unsure the Company's current position is acceptable to the Arizona Corporation Commission ("Commission"). While RUCO firmly believes that partial requirement customers should be their own rate sub-class, RUCO is concerned that partial requirements customers are only given one rate option. RUCO has already provided two different options, both of which provide partial requirement customers with a choice of rate plans and the other a fixed credit rate. In this docket, multiple Commissioners have requested the parties clarify some of RUCO's options, collaborate, and provide additional reasonable options. To meet these requests, RUCO will be providing easy to understand tables for RUCO's already proposed options. In addition, RUCO will be proposing an additional rate option, in the event the Commission wants to provide the same rate options to partial and full requirement customers.

In addition to the issues surrounding rate design, RUCO would like to respond to the issues of revenue allocation and the deferral of legal costs for tax valuation appeal of Gila River Unit 3. RUCO remains in alignment with Arizona Corporation Commission Staff ("Staff") on the revenue allocation among classes. The Company's proposed revenue allocation is overly aggressive. Staff's proposal strikes the appropriate balance in moving toward cost of service rate making and should be adopted. RUCO maintains its earlier position of a 50/50 sharing of legal costs for the tax valuation appeal. The Company points to the benefits to ratepayers as the primary reason for not sharing the legal costs. However, the Company failed to acknowledge the benefits to the Company and shareholders, if the appeal is successful. As such, the Commission should approve a 50/50 sharing of legal cost for the tax valuation appeal.

II. Rate Design

A. RUCO's Proposed Rate Design Options

1. Proposed Solution Proposed in Direct Testimony

RUCO has been focused on providing solutions to a complex set of problems. In this case, some of these complex issues include 1) addressing the cost shift caused by partial requirement customers, 2) maintaining the viability of solar, 3) creating rates that don't adversely impact low income customers and energy efficiency measures, 4) providing adequate fixed cost recovery for utilities, and 5) spreading costs appropriately across ratepayer classes. RUCO is the only intervenor who has put forth comprehensive rate design. RUCO's rate design strikes a delicate balance between the competing interests of many of the parties. In Commissioner Burns' letter to this docket, apparently seeing value in the options put forth by RUCO, he asked for the parties to 1) provide more evidence on the RUCO proposed options, and 2) explore other options. Many of the parties in this case, didn't provide analysis on RUCO's rate offering. While others put forward a token attempt of addressing the rate offering. Vote Solar for instance called the options "flawed."[1] The Alliance for Solar Choice ("TASC") called the options "unavailing."[2] All the while, providing no fact based evidence, only conjecture. The difficult nature of rate design in this case, is due mainly to the issues presented by partial requirement

[1] Vote Solar's Initial Post-Hearing Brief at 40.
[2] Post-Hearing Brief Of The Alliance For Solar Choice at 31.

customers, who are represented by Vote Solar and TASC. Yet, neither of which even attempted a rate design.

RUCO's options, evaluated as standalone rates, do not provide the full picture. It is the interworking of the rates, which make the picture complete. In their evaluation of RUCO's proposed rates, both Vote Solar and TASC are quick to point to staff's position of not "looking behind the meter," as reason for not treating partial requirement customers differently.[3] RUCO's Non-Export Option, ironically, is designed for not "looking behind the meter," and gives the solar advocates exactly what they are advocating for. What a customer does behind their meter on the Non-Export Option, is truly their business. Existing rate design and net metering rules, currently makes "what happens behind the meter," very much the business of all residential ratepayers. Currently, partial requirement customers use the grid for backup services, voltage and frequency regulation, inrush current, spinning and non-spinning reserves, and for other ancillary services, even during times of self-consumption.[4] These benefits are paid for primarily by full requirement customers. The solar advocates want partial requirement customers to have access to these services, but still maintain "what happens behind the meter" is their own business. The Non-Export Rate, if implemented, would allow "what happens behind the meter" to stay behind the meter, while providing a rate option that is not discriminatory in nature.

From the utility perspective, there appears to be two main criticisms of the RUCO's rate proposal, 1) the Non-Export option failed to capture any benefit of properly priced solar exports to the grid, and 2) the rate design was optional rates rather than mandatory.[5]

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[3] Vote Solar's Initial Post-Hearing Brief at 43.
[4] Ex. UNSE-25 (Tilghman Direct) at 4-6.
[5] Arizona Public Service Company's Initial Post-Hearing Brief at 11.

The solar advocates also raised the issue of failing to capture the benefits of solar exports to the grid. RUCO agrees with both the utility and the solar advocacy groups on the issue of not putting the excess energy to use. This is why RUCO proposed in our witnesses' direct, and again in the Closing Brief, a modification to this rate to pay for the exported energy at a market based rate. Thus, preserving what benefits there may be for residential ratepayers, who have been subsidizing solar adoption for many years now. RUCO's original Non-Export Option treats partial and full requirement customers exactly the same. The modified rate would no longer treat them the same.

The other criticism from the utility perspective is more global in nature. It is that RUCO's proposal provides options to customers. This criticism is more of a policy decision that will need to be made by the Commission. Staff and the Company advocated for one mandatory rate. RUCO, from the beginning in this rate case, has advocated for rate options for both full and partial requirement customers. This continues to be RUCO's position in this case.

There was some criticism of the Advanced DG TOU rate from the solar advocates. These criticisms were 1) there is a demand charge component, and 2) the $.085/kWh rate is not based on the actual value of solar. First, the criticism that the rate has a demand component. Vote Solar made, in support of their criticism, the argument that net metering customers are similarly situated to other residential customers, in their ability to effectively respond to a demand charge.[6] RUCO is struggling to understand why this argument was raised. Maybe Vote Solar was arguing that since full requirement customers are not on a universal three-part rate with a demand charge, partial requirement customers should not

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[6] Vote Solar's Initial Post-Hearing Brief at 43.

be either. If this is the reasoning, the criticism is misplaced because the proposed rate is optional. RUCO proposed this rate be open to full requirement customers as well. If implemented, full and partial requirement customers would have the same optional rate. RUCO fails to see the reasoning in Vote Solar's argument.

The argument that the $.085/kWh export rate is not based on the "actual value of solar" is also without merit. The solar advocates point to RUCO's attempt at valuing solar, as being "basic" because it didn't include a "thorough and detailed analysis of the benefits provided by solar."[7] RUCO agrees that it is basic but it captured all the major benefit categories. A more thorough analysis would yield little adjustment up or down. Additionally, what the solar advocates failed to acknowledge is there is, currently, no methodology or process adopted by the Commission, to do a "thorough and detailed analysis." Recognizing that the Company has the right to set just and reasonable rates within a specific time period, RUCO attempted, in good faith, to quantify the value of solar. In fact, it was just 1 cent/kWh lower than the TASC sponsored valuation, using the same benefit categories.[8] Waiting for the opened Value of Solar docket to complete is not an option in this case. RUCO's attempt at a valuation is a step in the right direction, and may ultimately favor partial requirement customers once the Value of Solar docket is complete. Because of the stability for solar adopting customers, RUCO believes the Advanced DG TOU rate may become a better rate than the RPS Bill Credit rate, over time.

Another criticism, common throughout the solar advocacy groups briefs, is the idea that when the compensation method is changed, the partial requirement customer's "ability

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[7] Id.
[8] Ex. TASC-21 at 34.

to self-consume" energy is removed.[9] Logically, one can apply simple scientific concepts and understand that a partial requirement customer is physically "self-consuming" their own generated power. The difference is only in the accounting. The insistence on continuing such advocacy, appears to be calculated. While this line of reasoning may be effective at stirring solar supporters to action, it is not productive for finding solutions to the complex problems of this rate case. Having the ability to change the accounting method, for compensating exported power, is central to developing a fair and reasonable rate offering. Especially for partial requirement customers on the Company's Residential Service.

In the Initial Post-Hearing Brief filed by Arizona Investment Council ("AIC"), AIC claims that all customers on RUCO's Advanced DG TOU rate will see an increase in their bill.[10] AIC is using expert opinion based on incorrect information. In RUCO expert, Lon Huber's surrebuttal testimony, he made a correction to the Advanced DG TOU rate, because of incorrect information received from the Company.[11] AIC's criticism relied on Mr. Hansen's expert opinion, formed prior to being notified of this correction, using an incorrect rate design.[12] As such, AIC's criticism that the Advanced DG TOU rate would increase all customers' bills, is not a valid criticism.

The RPS Bill Credit option is the rate option RUCO believes will be most popular, for the immediate future. This option starts at or near the current retail rate and decreases over time, based on the Company's REST compliance. Vote Solar once again dismissed

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[9] Vote Solar's Initial Post-Hearing Brief at 44.
[10] Arizona Investment Council's Initial Post-Hearing Brief at 9.
[11] Ex. RUCO-6 at 2.
[12] Arizona Investment Council's Initial Post-Hearing Brief at 9.

this option because the export rate could potentially "fall below even the crude solar valuation" found in the Advanced DG TOU.[13] Rather than recognize the potential of this rate option, it was immediately dismissed. In its current form, it provides a window of time for solar companies to be profitable, while providing time to develop a technology offering to maximize the potential sales to customers on the other rate options. In fact, Vote Solar must not understand the rate. Vote Solar says that "[b]ecause the solar export rate could decrease dramatically, this option could cause net metering customers to lose substantial amounts of money on their DG investments."[14] This statement is incorrect. This rate actually provides stability, in that the credit rate for solar adopting customer, is locked for 20 years from installation. The decreasing credit rate applies to predetermined customer tranches. For example, if June of 2018, the RPS Bill Credit rate has decreased to $.010/kWh, a customer installing solar would be locked into that $.010/kWh for 20 years. The credit rate will be known by all parties at the time of installation and will be locked in for that customer for the space of 20 years. RUCO sees this as a huge benefit to the solar industry because it solves the need for future grandfathering by providing rate stability. Another feature of this rate is its potential future application. The RPS Bill Credit could be modified by the Commission, to serve as a glide path for compensating energy exports. The Commission could use RPS Bill Credit framework to increase or decrease the current retail rate, to meet the future credit rate set by the value of solar methodology. Such a framework is similar to agreements in other states.

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[13] Vote Solar's Initial Post-Hearing Brief at 44.
[14] Id.

As stated earlier, some parties failed to address the RUCO proposed options, while others put forth a token attempt. Either way, to some in this rate case, anything other than "status quo" is not acceptable. RUCO, however, remains committed to finding solutions to the problems created by partial requirement customers. Below is a breakdown of RUCO's Direct Testimony proposal in table format.

<table>
<tr><th colspan="2">Option 1 - RUCO's Proposal (Direct Testimony)</th></tr>
<tr><td>Rates Available to Full Requirement Customers</td><td>Rates Available to Partial Requirement Customers</td></tr>
<tr><td>1. Nearly all rates offered to customers. Limited availability for standard customers to be on the advanced DG rate.</td><td>1. Non-Export Option
• Partial requirement customer can select any of the rates available to full requirement customers.
• No export of excess DG power allowed on the grid (RUCO is open to allowing exports on this option just at the MCCCG rate)
2. Advanced DG TOU Option
• Three-part rate
• Contains a minimum bill
• Export rate of excess DG power for customers who exchange REC is $.085.
• Export rate of excess DG power for customers who do not exchange REC is MCCCG rate
3. RPS Bill Credit Option
• Partial requirement customer can select any of the rates available to full requirement customers.
• Credit rate for new DG customers decreases over time as the Company's portfolio of renewable energy capacity is increased.
• Credit rate starts at $.11 per kWh and declines no lower than the MCCCG rate. The amount of decline can also be tied to the upcoming value of solar methodology.
• The reductions are based on pre-determined trenches which provides certainty to the customer choosing to become a partial requirement customer.
• Credit rates to be fixed for 20 years.
• Serves as a transition rate to provide viability to solar companies.</td></tr>
<tr><td colspan="2">Grandfathering: DG customers, who had an application submitted prior to the date of final order, should be fully grandfathered with existing rates and net metering compensation.</td></tr>
</table>

Fixed Charge: RUCO continues to support a fixed charge of $12.50.

2. Alternate Solutions Proposed In Closing Brief

With the exception of two letters from Commissioners, RUCO's proposal in Direct Testimony has not gained much support from the parties in this case. For this reason, RUCO proposed a new set of options, building on common middle ground, in the Closing Brief submitted on April 25, 2016. Recognizing that comments on these new rate options are forthcoming in the reply briefs, no more discussion is needed on these options. Below is a breakdown of RUCO's Closing Brief proposal in table format.

Option 2 - RUCO's Alternative Option (Closing Brief)	
Optional Rates Available to Full Requirement Customers	Optional Rates Available to Partial Requirement Customers
1. Residential Service 2. Residential Three-part TOU 3. Residential Volumetric Two-part TOU • This rate carries with it a $19 fixed charge. • Same TOU window as current rates 4. Full Requirement Residential Customer Two-part TOU • This rate is only available to full requirement customers. • Tighter TOU window	1. Residential Service • For DG customers with PV systems that produce <u>less</u> than 25% of their annual load, export rate to be full net metered rate. • For DG customers with PV systems that produce <u>more</u> than 25% of their annual load, export rate to be the average wholesale price for the month. • Compensation to be paid as a bill credit monthly with no kWh banking. 2. Residential Three-part TOU • Full net metering is preserved under this option 3. Residential Volumetric Two-part TOU • Full net metering is preserved under this option
<u>**Specifics Of This Option:**</u> **Grandfathering:** DG customers, who had an application submitted prior to the date of final order, should be fully grandfathered with existing rates and net metering compensation. **Fixed Charge:** RUCO continues to support a fixed charge of $12.50. The Residential Volumetric Two-part TOU rate carries with it a $19 fixed charge. **Net Metering:** The net metering rate, for the TOU options and those customers who produce less than 25% of their annual load, stays at the retail rate. The credit rate for partial requirement customer on the Residential Service, who produces more than 25% of their annual load, will be the	

average wholesale price for the month. If the Value of Solar docket is successful and produces a methodology for valuing solar energy, the compensation rate can be easily adjusted through REST proceeding for the Company to adjust up or down the rate. Additionally, the RPS Bill Credit option could be implemented as a glide path to gradually transition to the future credit rate.
<u>Optional Modifications The Commission Could Include With This Option:</u> **Metering Charge:** DG customers have additional costs that non-DG customers do not. DG customers in the Company's territory have two meters. This cost <u>could</u> be charged to all DG customer. The Commission <u>could</u> implement a $6.95/month metering charge for DG customers with a link to RECs. This is based on the Company's cost of service study. **Banking:** Current banking option <u>could</u> be modified from kWh for kWh exchange with excess power rolling forward to future months to an hourly net credit export rate based on hourly consumption/production that is paid monthly. For TOU rates, this switch has little to no impact on the economics of solar adopters.

B. Rate Offering Based On Collaboration

RUCO's position has been to address the unique issues, presented by partial requirement customers. RUCO proposed to do this by designing and providing rate options for partial requirement customers, separate and apart from full requirement customers. Other parties believe they should be provided the same rate options. For this reason, the Commission will need to make this policy decision. To be clear, RUCO firmly believes that rate options designed specifically for partial requirement customers that address the unique issues presented by these customers, is the preferred option. RUCO's already proposed options are what RUCO believes should be implemented. However, if the Commission determines that partial and full requirement customers should be provided the same rate options, a strong framework to build a rate design from will be needed. Currently, the only rate design put forward that provides the same rate options to partial and full requirement customers, is Staff's. The Company has backed away from this option and there are indications that Staff's proposal may have been too aggressive. After much collaboration, and in an effort to try and provide a solid framework for the Commission to build a uniform rate structure that provides the same rate options for partial and full requirement customers, RUCO proposes the following rate offering.

Option 3 - Treating Partial And Full Requirement Customers The Same
Optional Rates Available to All Customers 1. Residential Service • Hourly net credit export rate at 6 cents/kWh. This creates the same blended rate as the advanced DG rate and the volumetric TOU proposed by RUCO. • Banking is modified to an hourly net credit export rate based on hourly consumption/production that is paid monthly. • A grid access charge, similar to that of APS, may also be prudent. 2. Residential Three-part TOU • Customers on this rate keep the current form of banking and net metering. 3. Residential Volumetric Two-part TOU • Customers on this rate keep the current form of banking and net metering.
Energy Efficiency Only Rate Option: 1. Energy Efficiency Residential Customer Two-part TOU (Rename RUCO's Full Requirement Residential Customer Two-part TOU to become this rate) • Not available to customers who do not participate in a qualifying energy efficiency program nor customers participating in distributed generation. • To qualify for this rate, a customer must be enrolled in a pre-programmed thermostat or demand side management ("DSM") energy efficiency program offered by the Company.
<u>Specifics Of This Option:</u> **Grandfathering:** DG customers, who had an application submitted prior to the date of final order in the rate case, should be fully grandfathered with existing rates and net metering compensation. **Fixed Charge:** RUCO continues to support a fixed charge of $12.50. The Residential Volumetric Two-part TOU rate carries with it a $19 fixed charge. **Banking:** For partial requirement customers on the standard Residential Service, the current banking mechanism should be modified from a kWh for kWh exchange with excess power rolling forward to future months to an hourly net credit export rate based on hourly consumption/production that is paid monthly. Some solar advocates claim there are tax implications using this method. Most others disagree. However, if it is found to be true, that there are tax implications using this method, there are two other rate options, solar customers can choose from. Banking for partial requirement customers on a Residential Service, is the exact problem this rate case is trying to solve, and must be addressed. The TOU structure reduces the need to end banking at this juncture. However, the switch could still take place on RUCO's TOU rates with little to no impact, on the economics of solar adopters. **Net Metering:** If the Value of Solar docket is successful and produces a methodology for valuing solar energy, the compensation rate for the standard Residential Service can be easily adjusted from the 6 cent export rate noted above. Additionally, the RPS Bill Credit option could be implemented as a glide path to gradually transition to the future rate. **Metering Charge:** DG customers have additional costs that non-DG customers do not. DG customers in the Company's territory have two meters. This cost should be paid from by the DG customer. RUCO recommends implementing a $6.95/month metering charge for DG customers with a link to RECs. This is based on the Company's cost of service study.

Energy Efficiency Only Rate: The Energy Efficiency only rate is limited to residential ratepayers who are enrolled in a qualifying Company sponsored programmable thermostat or Demand Side Management energy efficiency program. This rate features a 3 hour peak window.

C. Continuing Settlement Discussions

Settlement discussions in this case have been ongoing. Unfortunately, time ran out before a settlement was reached. There appears to still be a desire, from some parties in this proceeding, to continue working on a possible settlement. Even after this brief is submitted. Recognizing the Commissioners' stated desire of the parties developing solutions to these problems, RUCO is ready and willing to continue settlement discussions. If further settlement discussions are to be had, the Commission and parties will be notified.

III. Revenue Allocation

Staff and the Company are proposing a revenue allocation that moves all customer classes, closer to cost of service rates. Both Staff and the Company have different proposals for moving rates closer to this cost of service. Staff is proposing a less aggressive transition, while the Company's is a little more aggressive.[15] Staff, after taking into consideration the size of the classes, the size of the increase, the fact that at least two rates cases were needed to get to a cost of service rate, proposed a 58.3 percent for the residential class and a 7.3 percent of the overall increase for SGS class.[16] This is in contrast to a 91.2 percent for the residential class and 11.8 percent of the overall increase for SGS class. RUCO agrees with Staff's position and recommends that the Commission adopt Staff's proposed revenue allocation.

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[15] Staff's Opening Brief at 9-10.
[16] Id. at 10.

IV. Legal Costs For Appeal Of Valuation For Gila River Generation Station

The Company in their Initial Post-Hearing Brief responded to RUCO's proposed 50/50 sharing of legal costs. In so doing, the Company relied on the argument that ratepayers would benefit from a successful appeal.[17] RUCO has never argued this point. However, the Company failed to quantify the benefits received by the Company and its shareholders. It is RUCO's contention that a successful appeal would provide equal benefits to the Company. RUCO continues to recommend a 50/50 sharing of legal costs.

V. Conclusion

The rate design in this case is complex and requires many hard decisions be made. RUCO has developed a number of rate options to aid the Commission on creating a comprehensive rate offering for the Company. RUCO recommends the Commission adopt one of RUCO's proposals as the framework for this rate offering. RUCO also recommends that adoption of Staff's revenue allocation, as it strikes the appropriate balance in the transition to cost of service rates. RUCO also recommends the legal fees for the property tax valuation appeal be shared 50/50, between ratepayers and the Company, because both parties receive the benefit of a successful appeal.

RESPECTFULLY SUBMITTED this 11th day of May, 2016.

Jordy Fuentes
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[17] UNS Electrics Post-Hearing Brief at 57.

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