

ORIGINAL

COMMISSIONERS  
DONG LITTLE - Chairman  
BOB STUMP  
BOB BURNS  
TOM FORESE  
ANDY TOBIN



0000170328

ARIZONA CORPORATION COMMISSION

May 13, 2016

To: Docket Control

RE: Sulphur Springs Valley Electric Cooperative - Customer Comments

Docket No. E-01575A-15-0312

RECEIVED  
2016 MAY 13 P 3:19  
AZ CORP COMMISSION  
DOCKET CONTROL

Please docket the attached 53 customer comments OPPOSING the above filed case.

Customer comments can be reviewed in E-docket under the above docket number.

Filed by: Utilities Division - Consumer Services

Arizona Corporation Commission

DOCKETED

MAY 13 2016

DOCKETED BY	<i>WJ</i>
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E-01575A-15-0312

**Arizona Corporation Commission  
Utilities Complaint Form**

**Investigator:** Trish Meeter

**Phone:** 602-542-0622

**Opinion Date:** 5/13/2016

**Opinion Number:** 2016 - 131540

**Priority:** Respond within 5 business days

**Opinion Codes:** Rate Case Items - Opposed

**Closed Date:** 5/13/2016 8:26 AM

**First Name:** PETITION

**Last Name:** PETITION

**Account Name:** PETITION  
PETITION

**Address:**

**City:**

**State:**

**Zip Code:**

**Company:** Sulphur Springs Valley Electric Cooperative,  
Inc.

**Division:** Electric

**Nature Of Opinion**

**Docket Number:** E-01575A-15-0312

Eight signatures representing same number of addresses OPPOSED to the proposed increase in rates.

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

Regards,

Timothy fry

Benson, AZ 85602

Howard Conover

**E-01575A-15-0312**

**Arizona Corporation Commission  
Utilities Complaint Form**

Gary Erickson

Jeff Owens

Rick McKeller

Lynda Markwood

Robson Alder

Steve Sherman

Timothy Fry

**E-01575A-15-0312**

**Arizona Corporation Commission  
Utilities Complaint Form**

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**Investigator:** Trish Meeter      **Phone:** <<< REDACTED >>>      **Opinion Date:** 5/12/2016  
**Opinion Number:** 2016 - 131529      **Priority:** Respond within 5 business days  
**Opinion Codes:** Rate Case Items - Opposed      **Closed Date:** 5/12/2016 10:36 AM

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**First Name:** Petition      **Last Name:** Petition      **Account Name:**  
**Address:**  
**City:**      **State:**      **Zip Code:**  
**Home:** <<< REDACTED >>>

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**Company:** Sulphur Springs Valley Electric Cooperative, Inc.      **Division:** Electric

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**Nature Of Opinion**

**Docket Number:** E-01575A-15-0312

11 comments representing 10 addresses in opposition of the rate increase request.

**From:** Richard Craine <<< REDACTED >>>  
**Sent:** Wednesday, May 11, 2016 4:36 PM  
**To:** Utilities Div - Mailbox <UtilitiesDiv@azcc.gov>  
**Subject:** Reject new SSVEC fixed fees!

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

E-01575A-15-0312

**Arizona Corporation Commission  
Utilities Complaint Form**

Regards,

Richard Craine

Donna

Gail St. Clair

R Wark

Ron St.Clair

Patricia Wade

Vickie Marie

Denise Hyatt-Meadows

Kay Landt

Clark Richards

Tawnie Moore

Kathryn Hjulberg

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<b>Investigation</b>			
<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/12/2016 docketed	Trish Meeter	Telephone	Investigation

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# Arizona Corporation Commission Utilities Complaint Form

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**Investigator:** Deborah Reagan    **Phone:** <<< REDACTED >>>    **Opinion Date:** 5/11/2016  
**Opinion Number:** 2016 - 131510    **Priority:** Respond within 5 business days  
**Opinion Codes:** Rate Case Items - Opposed    **Closed Date:** 5/11/2016 9:33 AM

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**First Name:** J    **Last Name:** O'Neall    **Account Name:** J O'Neall  
**Address:** <<< REDACTED >>>  
**City:** Sierra Vista    **State:** AZ    **Zip Code:** 85650

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**Company:** Sulphur Springs Valley Electric Cooperative, Inc.    **Division:** Electric

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### Nature Of Opinion

**Docket Number:** E-01575A-15-0312    **Docket Position:** Against

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

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<b>Investigation</b>			
<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/11/2016	Deborah Reagan	Telephone	Investigation

Comments entered for the record and filed with Docket Control.

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# Arizona Corporation Commission Utilities Complaint Form

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**Investigator:** Deborah Reagan    **Phone:** <<< REDACTED >>>    **Opinion Date:** 5/11/2016  
**Opinion Number:** 2016 - 131513    **Priority:** Respond within 5 business days  
**Opinion Codes:** Rate Case Items - Opposed    **Closed Date:** 5/11/2016 9:32 AM

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**First Name:** Allen    **Last Name:** Peabody    **Account Name:** Allen Peabody  
**Address:**  
**City:**    **State:**    **Zip Code:**

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**Company:** Sulphur Springs Valley Electric Cooperative, Inc.    **Division:** Electric

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### Nature Of Opinion

**Docket Number:** E-01575A-15-0312    **Docket Position:** Against

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

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<b>Date:</b>	<b>Analyst:</b>	<b>Investigation Submitted By:</b>	<b>Type:</b>
5/11/2016	Deborah Reagan	Telephone	Investigation

Comments entered for the record and filed with Docket Control.

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# Arizona Corporation Commission Utilities Complaint Form

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**Investigator:** Deborah Reagan    **Phone:** <<< REDACTED >>>    **Opinion Date:** 5/11/2016  
**Opinion Number:** 2016 - 131514    **Priority:** Respond within 5 business days  
**Opinion Codes:** Rate Case Items - Opposed    **Closed Date:** 5/11/2016 9:28 AM

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**First Name:** Cynthia    **Last Name:** Voss    **Account Name:** Cynthia Voss  
**Address:**  
**City:**    **State:**    **Zip Code:**

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**Company:** Sulphur Springs Valley Electric Cooperative, Inc.    **Division:** Electric

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### Nature Of Opinion

**Docket Number:** E-01575A-15-0312    **Docket Position:** Against

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

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<b>Investigation</b>			
<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/11/2016	Deborah Reagan	Telephone	Investigation

Comments entered for the record and filed with Docket Control.

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# Arizona Corporation Commission Utilities Complaint Form

Investigator: Deborah Reagan Phone: <<< REDACTED >>> Opinion Date: 5/11/2016  
 Opinion Number: 2016 - 131511 Priority: Respond within 5 business days  
 Opinion Codes: Rate Case Items - Opposed Closed Date: 5/11/2016 9:25 AM

First Name: David Last Name: King Account Name: David King  
 Address:  
 City: State: Zip Code:

Company: Sulphur Springs Valley Electric Cooperative, Inc. Division: Electric

### Nature Of Opinion

Docket Number: E-01575A-15-0312 Docket Position: Against

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

Investigation			
Date:	Analyst:	Submitted By:	Type:
5/11/2016	Deborah Reagan	Telephone	Investigation

Comments entered for the record and filed with Docket Control.

Arizona Corporation Commission  
Utilities Complaint Form

Investigator: Deborah Reagan Phone: <<< REDACTED >>> Opinion Date: 5/9/2016  
Opinion Number: 2016 - 131459 Priority: Respond within 5 business days  
Opinion Codes: Rate Case Items - Opposed Closed Date: 5/9/2016 3:07 PM

First Name: Douglas Last Name: Behnke Account Name: Douglas Behnke  
Address: <<< REDACTED >>>  
City: Sierra Vista State: AZ Zip Code: 85635  
Cell: <<< REDACTED >>> Email: <<< REDACTED >>>

Company: Sulphur Springs Valley Electric Cooperative, Inc. Division: Electric

Nature Of Opinion

Docket Number: E-01575A-15-0312 Docket Position: Against

RE: Sulphur Springs Valley Electric Cooperative (SSVEC Rate) Application Case, Docket E-01575A-15-0312 Dear Commissioners, I am a member of the Sulphur Springs Valley Electric Cooperative (SSVEC) and an existing distributed generation (DG) residential customer, so this rate case will directly affect me now and in the future. These higher-level comments are primarily based upon the SSVEC Rate Application Case, Docket E-01575A-15-0312, 18 March Direct Rate Design Testimony of ACC Staff and the 22 April SSVEC Rebuttal: 1. I support the Arizona Corporation Commission (ACC) Staff's Proposed Residential Service Rate's service availability charges of \$18.25 in year one and \$27.00 in year two for all residential customers based upon the ACC staff's preference to not differentiate between distributed generation (DG) or non-DG SSVEC customers that make up the residential class of customers. I understand that this is an interim rate structure proposal and I appreciate the incremental approach of the ACC staff. The entire issue of how to fairly charge customers for fixed infrastructure costs based upon anticipated changes in the electric utility industry philosophy and type of power mix supports the ACC staff's incremental approach, as some of the anticipated changes will not occur or not occur as predicted and other unanticipated changes might have a significant impact. I recommend waiting until the next SSVEC rate case to make any larger service availability charge adjustments than the ACC Staff proposed, as there will be additional information to make a more informed decision. 2. I support the ACC Staff recommendation and appreciate the SSVEC rebuttal support that the current rate schedule be retained for existing DG customers (installed or signed agreement) before 15 April 2015. In addition, I suggest these recommendations should be enhanced in the following ways: a) The ACC staff does not appear to have indicated how long the current rate schedule should remain in effect for existing DG customers before 15 April 2015, but the SSVEC rebuttal indicates 20 years from the date the customer's solar system provided energy to the grid. I support the SSVEC's clarification of 20 years, as this is a reasonable timeframe based upon the warrantee ranges of the currently installed solar generation components. In addition, the 20-year grandfathering period should be transferrable to all subsequent owners of the DG system up to the 20-year period end date. SSVEC DG customers made a long-term investment and they should get the return from the entire 20-year period. b) SSVEC distributed a short/no reaction time notice to its members that close of business 14 April 2015 was the last date members could install or obtain a signed agreement that allowed them to remain under the current rules or tariff. I strongly recommend the ACC should rule that the cutoff date for the current SSVEC rules and tariff is not 14 April 2015, but at least the date the ACC announces its rate case decision or the future date when the ACC rate case decision rates take effect. This enhancement is supported by the principle that a utility should not be allowed to change the rules of the game with so little notice that those effected do not have any time to react in a meaningful way and without getting the prior approval of the ACC. I believe this is especially true of electric cooperatives, such as SSVEC, where the members are the owners. In this case, I believe the ACC should not support the concept where a utility can change the rules (rate structure, etc.) before the

## Arizona Corporation Commission Utilities Complaint Form

ACC has made a considered decision on the utility's rate application. The ACC is charged with oversight of Arizona utilities and is responsible for approving rate changes, so no utility should be allowed to make or indicate that it can make any rate related changes before an ACC decision. Finally, the utilities know roughly how long it takes the ACC to decide a rate case, so why should a utility's customers be surprised and penalized for the lack of planning on the part of the utility? 3. I do not support the ACC staff recommendation to eliminate the banking of excess kWh and the elimination of the current SSVEC net-zero process. The ACC staff talked about the possibility of DG customers installing DG systems that produce far in excess of the DG customer's needs. I believe SSVEC has created a net-zero process that has precluded this from happening and could make further enhancements to ensure it does not happen in the future. In addition, I believe the net-zero system is easy to administer where the "true-up" occurs on an annual basis rather than a monthly basis. Sincerely, Douglas J. Behnke 1420 Camino Rancho Sierra Vista, Arizona 85635

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**Investigation**

<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/9/2016	Deborah Reagan	Telephone	Investigation

Comments entered for the record and filed with Docket Control.

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E-01575A-15-0312

## Arizona Corporation Commission Utilities Complaint Form

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<b>Investigator:</b> Michael Buck	<b>Phone:</b> <<< REDACTED >>>	<b>Opinion Date:</b> 5/9/2016
<b>Opinion Number:</b> 2016 - 131444	<b>Priority:</b> Respond within 5 business days	
<b>Opinion Codes:</b> Rate Case Items - Opposed	<b>Closed Date:</b> 5/9/2016 11:40 AM	

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<b>First Name:</b> Annie	<b>Last Name:</b> McGreevy	<b>Account Name:</b> Annie McGreevy
<b>Address:</b> <<< REDACTED >>>		
<b>City:</b> Sonoita	<b>State:</b> AZ	<b>Zip Code:</b> 85637
<b>Home:</b> <<< REDACTED >>>	<b>Cell:</b> <<< REDACTED >>>	<b>Email:</b> <<< REDACTED >>>

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<b>Company:</b> Sulphur Springs Valley Electric Cooperative, Inc.	<b>Division:</b> Electric
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### Nature Of Opinion

**Docket Number:** E-01575A-15-0312

**Docket Position:** Against

Dear Commissioners, I am a member of the Sulphur Springs Valley Electric Cooperative (SSVEC) and an existing distributed generation (DG) residential customer, so this rate case will directly affect me now and in the future. These higher-level comments are primarily based upon the SSVEC Rate Application Case, Docket E-01575A-15-0312, 18 March Direct Rate Design Testimony of ACC Staff and the 22 April SSVEC Rebuttal: 1. I support the Arizona Corporation Commission (ACC) Staff's Proposed Residential Service Rate's service availability charges of \$18.25 in year one and \$27.00 in year two for all residential customers based upon the ACC staff's preference to not differentiate between distributed generation (DG) or non-DG SSVEC customers that make up the residential class of customers. I understand that this is an interim rate structure proposal and I appreciate the incremental approach of the ACC staff. The entire issue of how to fairly charge customers for fixed infrastructure costs based upon anticipated changes in the electric utility industry philosophy and type of power mix supports the ACC staff's incremental approach, as some of the anticipated changes will not occur or not occur as predicted and other unanticipated changes might have a significant impact. I recommend waiting until the next SSVEC rate case to make any larger service availability charge adjustments than the ACC Staff proposed, as there will be additional information to make a more informed decision. 2. I support the ACC Staff recommendation and appreciate the SSVEC rebuttal support that the current rate schedule be retained for existing DG customers (installed or signed agreement) before 15 April 2015. In addition, I suggest these recommendations should be enhanced in the following ways: a) The ACC staff does not appear to have indicated how long the current rate schedule should remain in effect for existing DG customers before 15 April 2015, but the SSVEC rebuttal indicates 20 years from the date the customer's solar system provided energy to the grid. I support the SSVEC's clarification of 20 years, as this is a reasonable timeframe based upon the warranty ranges of the currently installed solar generation components. In addition, the 20-year grandfathering period should be transferrable to all subsequent owners of the DG system up to the 20-year period end date. SSVEC DG customers made a long-term investment and they should get the return from the entire 20-year period. b) SSVEC distributed a short/no reaction time notice to its members that close of business 14 April 2015 was the last date members could install or obtain a signed agreement that allowed them to remain under the current rules or tariff. I strongly recommend the ACC should rule that the cutoff date for the current SSVEC rules and tariff is not 14 April 2015, but at least the date the ACC announces its rate case decision or the future date when the ACC rate case decision rates take effect. This enhancement is supported by the principle that a utility should not be allowed to change the rules of the game with so little notice that those effected do not have any time to react in a meaningful way and without getting the prior approval of the ACC. I believe this is especially true of electric cooperatives, such as SSVEC, where the members are the owners. In this case, I believe the ACC should not support the concept where a utility can change the rules (rate structure, etc.) before the ACC has made a considered decision on the utility's rate application. The ACC is charged with oversight of

## Arizona Corporation Commission Utilities Complaint Form

Arizona utilities and is responsible for approving rate changes, so no utility should be allowed to make or indicate that it can make any rate related changes before an ACC decision. Finally, the utilities know roughly how long it takes the ACC to decide a rate case, so why should a utility's customers be surprised and penalized for the lack of planning on the part of the utility? 3. I do not support the ACC staff recommendation to eliminate the banking of excess kWh and the elimination of the current SSVEC net-zero process. The ACC staff talked about the possibility of DG customers installing DG systems that produce far in excess of the DG customer's needs. I believe SSVEC has created a net-zero process that has precluded this from happening and could make further enhancements to ensure it does not happen in the future. In addition, I believe the net-zero system is easy to administer where the "true-up" occurs on an annual basis rather than a monthly basis. Sincerely, Annie McGreevy

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<b>Investigation</b>			
<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/9/2016	Michael Buck	Telephone	Investigation

Enter into the record and docketed. Closed.

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E-01575A-15-0312

## Arizona Corporation Commission Utilities Complaint Form

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**Investigator:** Michael Buck      **Phone:** <<< REDACTED >>>      **Opinion Date:** 5/9/2016

**Opinion Number:** 2016 - 131445      **Priority:** Respond within 5 business days

**Opinion Codes:** Rate Case Items - Opposed      **Closed Date:** 5/9/2016 1:12 PM

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**First Name:** Annie      **Last Name:** McGreevy      **Account Name:** Annie McGreevy

**Address:** <<< REDACTED >>>

**City:** Sonoita      **State:** AZ      **Zip Code:** 85637

**Home:** <<< REDACTED >>>      **Cell:** <<< REDACTED >>>      **Email:** <<< REDACTED >>>

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**Company:** Sulphur Springs Valley Electric Cooperative, Inc.      **Division:** Electric

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### Nature Of Opinion

**Docket Number:** E-01575A-15-0312

**Docket Position:** Against

RE: Sulphur Springs Valley Electric Cooperative (SSVEC Rate) Application Case, Docket E-01575A-15-0312 Dear Commissioners, I am a member of the Sulphur Springs Valley Electric Cooperative (SSVEC) and an existing distributed generation (DG) residential customer, so this rate case will directly affect me now and in the future. These higher-level comments are primarily based upon the SSVEC Rate Application Case, Docket E-01575A-15-0312, 18 March Direct Rate Design Testimony of ACC Staff and the 22 April SSVEC Rebuttal: 1. I support the ACC staff recommendation that the export rates be updated on a recurring basis, but I recommend doing this on an annual basis. Currently the SSVEC kWh rate for positive net metering annual balances is recalculated annually under the supervision of the ACC and the export rate in the ACC staff proposal could involve many if not all of the same factors. In addition, the SSVEC rebuttal proposed using the criteria of known, measurable, and of a continuing nature for its export rate calculations. With the ongoing changes in the utility industry, there could be new/changed factors that meet the proposed SSVEC criteria on an annual basis. 2. As for the export rate calculation, I recommend the ACC should support the goal that those who caused a benefit should reap the cost savings of the benefit with ACC oversight of the process. The ACC staff has recommended the use of an export rate to value DG generated power. In the SSVEC rebuttal a series of Energy Freedom Coalition of America (EFCA) recommended DG savings were listed for the export rate, which SSVEC rejected in most cases based upon the SSVEC proposed export rate criteria of known, measurable, and of a continuing nature. It was encouraging to see that SSVEC did not reject electricity generation and transmission (G&T) DG savings out of hand, because SSVEC representatives have stated that SSVEC is only a power distribution utility, so they should not count G&T savings in their export rate DG savings calculations. DG savings to SSVEC of any sort should be included in the export rate calculations. Consequently, for the reasons stated above, I recommend the ACC create strong, thorough ACC oversight procedures for the export rate setting process that include SSVEC member participation, if feasible, to help ensure DG savings throughout the grid are passed on to the DG customers in some manner. In addition, in their rebuttal SSVEC recommended the export rate be set at the SSVEC avoided cost. I disagree with the SSVEC rebuttal and recommend the ACC support the ACC staff testimony position that the "price floor for DG should be valued at Avoided Cost and the price ceiling for DG should be its currently valued rate, the retail rate. Staff is left with determining an export rate for DG somewhere between avoided cost and the retail rate." The ACC has created ACC Investigation of Value and Cost of DG, Docket E-00000J-14-0023, where the cost-benefits of DG will be determined, so this docket's findings should be used as the basis for the ACC staff to determine the initial SSVEC export rate and as the basis for the annual export rate update recommended in the previous paragraph. The findings of Docket E-00000J-14-0023 are a snapshot in time. The ACC staff should also be tasked with updating these findings, so that new and/or enhanced current DG cost-benefit factors can be added to the export rate calculation process.

Sincerely, Annie McGreevy

**E-01575A-15-0312**

**Arizona Corporation Commission  
Utilities Complaint Form**

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		<b>Investigation</b>	
<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/9/2016	Michael Buck	Telephone	Investigation
Entered into the record and docketed. Closed.			

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E-01575A-15-0312

**Arizona Corporation Commission  
Utilities Complaint Form**

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**Investigator:** Tom Davis      **Phone:** <<< REDACTED >>>      **Opinion Date:** 5/13/2016  
**Opinion Number:** 2016 - 131537      **Priority:** Respond within 5 business days  
**Opinion Codes:** Rate Case Items - Opposed      **Closed Date:** 5/13/2016 9:07 AM

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**First Name:** PETITION      **Last Name:** PETITION      **Account Name:** PETITION  
PETITION

**Address:**

**City:**      **State:**      **Zip Code:**

---

**Company:** Sulphur Springs Valley Electric Cooperative, Inc.      **Division:** Electric

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**Nature Of Opinion**

**Docket Number:** E-01575A-15-0312      **Docket Position:** Against

Received the following identical comments from 12 customers opposed to the proposed rate case.

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for non-solar customers and solar customers are the highest we have ever seen proposed in the state. Raising fees for no-solar customers 143% & 286% for solar customers is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

**E-01575A-15-0312**

**Arizona Corporation Commission  
Utilities Complaint Form**

Submitted by:

1. Gary Taylor 2. Ronald Davis 3. Maureen Lawrence-Barham 4. Jon Vaughn 5. Alisa Cook 6. Dana Parsons  
7. Lourdes Martinez 8. Chester Lockwood 9. Aaron Basques 10. Bob Kern 11. Jerry Reed

12. Erica Tatom

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<b>Investigation</b>			
<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/13/2016	Tom Davis	Other	Investigation
Entered for the record and docketed. CLOSED			

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E-01575A-15-0312

**Arizona Corporation Commission  
Utilities Complaint Form**

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**Investigator:** Al Amezcua      **Phone:** <<< REDACTED >>>      **Opinion Date:** 5/13/2016  
**Opinion Number:** 2016 - 131538      **Priority:** Respond within 5 business days  
**Opinion Codes:** Rate Case Items - Opposed      **Closed Date:** 5/13/2016 8:22 AM

---

**First Name:** PETITION      **Last Name:** PETITION      **Account Name:** PETITION  
PETITION

**Address:**

**City:**      **State:**      **Zip Code:**

---

**Company:** Sulphur Springs Valley Electric Cooperative, Inc.      **Division:** Electric

Lainie Keltner      **Phone:** <<< REDACTED >>>      **Email:** <<< REDACTED >>>

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**Nature Of Opinion**

**Docket Number:** E-01575A-15-0312

**Docket Position:** Against

Received the following identical comments from 15 customers opposed to the proposed rate case.

Sent: Tuesday, May 10, 2016 11:45 PM

To: Utilities Div - Mailbox <<< REDACTED >>>

Subject: Reject new SSVEC fixed fees!

Dear Commissioner Arizona Corporation Commission,

I urge you to reject Sulphur Springs Valley Electric Cooperative's proposal in docket E-01575A-15-0312.

The proposed fixed fees for solar customers are the highest we have ever seen proposed in the state. Raising fees 286% is a punitive and arbitrary attempt to block solar adoption. If passed, the solar industry would be forced out of the territory, threatening solar jobs and eliminating energy choice for all members of the cooperative. Additionally, this excessive fee would render current solar savings in the territory mute, leaving homeowners upside down in their investment.

Attempting to collect lost revenue from your ratepayers who are elderly, on fixed incomes, or low-income is just bad business. A 143% increased fixed fee on the residential class is also detrimental to these residents as it is to the solar customers.

I urge you to reject this proposal. Please protect the interests of the cooperative's members. These drastic fee increases are not in our best interest.

Regards,

**E-01575A-15-0312**

**Arizona Corporation Commission  
Utilities Complaint Form**

1. Jamie Fenn   2. Danny Haro   3. Mark Ulatowski   4. Christianna Myers   5. Susie Vasquez  
6. Lynn Hammock   7. Peter White   8. Gregory Kniffen   9. Marian Girelach   10. Kathleen Gough  
11. Timothy Murphy   12. Barbara Kocevar   13. Deborah Allen   14. Kevin Stamback   15. Vicki Marvick

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**Investigation**

<b>Date:</b>	<b>Analyst:</b>	<b>Submitted By:</b>	<b>Type:</b>
5/13/2016	Al Amezcua	Email	Investigation

Comments noted for the record and docketed. CLOSED.

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