# SRP Price Process Comments with Response Week ending December 21, 2024

# SRP Public Price Process Responses from: 12/16/2024

Name: Billy Vaughan

Record Number: 99330296

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

In your explore ways to save, you exclude the business electric vehicle and E-Tech programs. These are ways to saves money and carbons. You will need separate links You do a good job of showing when the last rate change was and the amount we deferred due to Covid. I'd suggest you put this in the main sections and not just buried in a drop-down FAQ. It will have been six years since the last rate DECREASE of 2.2% so why not compare that with either inflation or energy inflation. You may want to spell out FPPAM at the top of its section. What are the hour changes to the TOU rates? I didn't find that info. The experimental EV plan will evolve to a permanent plan. What are those changes exactly? Request that we add a commercial EV charger rate, similar to residential. Why have one without the other?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#99330296

Response Attachments: SRP Management Response to Billy Vaughan Request for

Information\_BV1.docx;

\*To receive a copy of Attachments please

contact the Corporate Secretary's Office and Reference

Record #99330296

#### Billy Vaughan,

Thank you for your suggestions. With the feedback from you and others, we're working to improve our communications, including highlighting new low-cost hours.

Management is proposing that we simplify our portfolio of Price Plans and bring the super off-peak concept that EV customers currently enjoy to all our residential and commercial time-of-use Price Plans. Under Management's Proposal, our two residential time-of-use plans going forward would both include 8 a.m. -3 p.m. super off-peak prices that are more than 50% lower than basic price plans, and even lower than the current Electric Vehicle Price Plan's super off-peak prices. The on-peak period would be from 6-9 p.m. or 5-10 p.m., depending on the Plan. All commercial and industrial Price Plans that include time-of-use hours would also have a low-price period from 8 a.m. -3 p.m.

Management is proposing a low-price daytime period because of changing grid dynamics and the emergence of a low-cost, low-emission period when solar energy is abundant. This approach encourages EV charging and customer usage during these hours, thereby lowering emissions and costs, and further enabling EV charging across all our time-of-use price plans.

Management is proposing to freeze the current E-29 Residential EV rate and move existing customers to the E-28 rate, which has super off-peak hours from 8am to 3pm, encouraging EV charging during daytime hours when there is an abundance of clean solar power. Similarly, the E-32 Commercial Time of Use price plan is proposed to have the same off-peak hours, encouraging business customers to charge during the daytime.

# Name: Jeff Cross

**Record Number:** 719142de

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

**Comment:** 

Has SRP looked at its spending? How much is this public entity spending on advertisements? WHY? Nobody has a choice. There is no need to advertise! How much do you give to non profits? Like when the Super Bowl was in town or other non profits? Stop! This isn't your money to give away? Lastly How is it ok to charge me more to give more away to people that can't pay there bill? You give them the money to pay the bill back to you with everyone else money? Does that see ethical? No. The users of SRP have no say in the matter where OUR money goes! Raise rates for improvements that are needed or for employee benefit cost increases or increase in employees wage. NOT for advertisements, nonprofits or back to yourself.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#719142de

#### Response:

Hi Jeff,

Thank you for your questions.

In fiscal year 2024, SRP spent \$10.2 million to advertising in our service territory to achieve our corporate objectives. These efforts focus on helping our customers reduce costs and enhance their experience by promoting education and enrollment in SRP programs and products.

SRP supports nonprofit organizations that address a number of critical community needs related to matters such as heat relief, homelessness prevention, food insecurity, workforce development, and education. In fiscal year 2024, SRP contributed about \$4.7 million to local nonprofit organizations, which amounts to less than \$3 annually per customer.

# Name: Chris Brooks

**Record Number:** b98709f9

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

Will Solar residents be charged more with SRP? Like APS has done?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#b98709f9

Response:

Hi Chris,

Thank you for your questions.

This proposal does not include a grid access or similar charge for customers with solar.

# Name: Ken Ahlberg

Record Number: 08226784

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

Wondering why the home solar rate customers increased more than traditional customers? Since they generate clean energy and help decentralized a grid more vulnerable to outages, I would think it wiser to encourage those customers switching to renewable. Am I missing something?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#08226784

Hi Ken,

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

At the same time, management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal is to simplify the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans down to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on the new price plans will have the same monthly service charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on market prices for energy at the times of solar export.

Although it is not part of the pricing proposal, SRP management anticipates, after the conclusion of the pricing process, developing and seeking Board approval for a new residential solar program that recognizes the benefits of certain environmental attributes. The program will be designed to provide a simple path for residential customers to realize a financial benefit for Renewable Energy Certificates applicable to their solar generation by transferring those environmental attributes to SRP. The program, if approved, will not only support SRP's renewable energy goals, but will also reinforce sustainable energy solutions.

Thank you for your interest in SRP.

# Name: MICHELLE GONZALES

**Record Number:** 6c091c59

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

Subject: Inquiry Regarding Solar Plans and Competitive Energy Options Dear SRP Team, I hope this message finds you well. I am writing as a solar customer with significant concerns about my monthly utility bill, which consistently exceeds \$395 despite my investment in solar energy. I have friends residing in areas serviced by APS who, with homes of similar size, have no monthly payments or fees and receive credits for the energy they produce. Additionally, when I lived in California with solar, I never had a bill and regularly received credits for excess energy generated. It seems counterintuitive that contributing to a greener planet by producing clean energy through solar should result in costs comparable to, or even higher than, those without solar in Arizona. Could you provide insight into SRP's plans for implementing competitive energy options similar to those offered by APS or other leading providers? Are there upcoming changes or programs that could better support solar customers and encourage sustainable energy use? Thank you for your attention to this matter, and I look forward to your response. Best regards, Michelle Gonzales

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#6c091c59

Hi Michelle,

In analyzing SRP solar customers' data, SRP management has found that on average, those customers have lower bills under SRP's solar price plans than they would under comparable rate plans with other utilities in Arizona, though there will be variation depending on the individual customer's usage and generation.

SRP understands that rooftop solar panels can be a significant investment and appreciates your commitment to renewable energy. Your SRP bill will be lower with solar generation than it would be without, though SRP must bill for the amount needed to cover the costs of providing you with electric service. Typically, solar customers continue to rely on SRP for around two-thirds of their electricity needs, especially during peak times when electricity is most expensive.

The savings on your SRP bill are unrelated to the cost of your solar panels. Whether your SRP bill savings exceed the cost of your solar panels will depend on a variety of factors, including how the panels perform and what you paid for them.

Although it is not part of the pricing proposal, SRP management anticipates, after the conclusion of the pricing process, developing and seeking Board approval for a new residential solar program that recognizes the benefits of certain environmental attributes. The program will be designed to provide a simple path for residential customers to realize a financial benefit for Renewable Energy Certificates applicable to their solar generation by transferring those environmental attributes to SRP. The program, if approved, will not only support SRP's renewable energy goals, but will also reinforce sustainable energy solutions.

# **Name: Matthew Perez**

**Record Number:** 08ccbba7

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

**Comment:** 

How about equal pricing for people who have solar panels? We get solar panels to lower our electric grid consumption but because you as a company are losing money from this you charge a premium for what we do use. I'm not saying reward solar users for trying to keep demand low, but don't charge extra for loss revenue for doing the right thing.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#08ccbba7

#### Response:

Hi Matthew,

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

Thank you for your interest in SRP.

# Name: Trisha Lathen

Record Number: 3992b4c0

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

Comment:

I have this address and a condo rental i make 0 dollars on, as well on my personal account. I sure hope you can prove a need in this economy to raise prices on power people already struggle to pay for. Please prove WHY! I do not agree with an increase. Reevaluate ypur spending, payroll and bonuses issued yearly. I am a small buisness owner and I have not taken bonus or pay increases for 3 years. I have given my employees raises but not myself. I am proud of that.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#3992b4c0

Trisha,

Thank you for your comment.

SRP's need for a price process is to maintain SRP's long-term financial health. SRP strives to maintain a balance between borrowing for electric grid infrastructure costs and recovering these costs through retail rates. This ensures that current and future customers both pay their fair share of grid costs. Striking this balance between generations of customers helps to maintain SRP's long-term financial health.

The proposal also accounts for rising costs. SRP has been investing in the grid at historic levels to ensure reliability, increase sustainability and keep up with increasing electricity demand. Costs for materials remain elevated and lead times remain longer compared to the pre-pandemic period. Additionally, SRP has incurred heightened costs in an effort to enhance the customer experience.

Lastly, it reflects the continued transition to sustainable resources and new technologies. Renewable resources, such as solar, are an integral part of SRP's resource plans and reduce the dependence on carbon intensive resources. This proposal takes into account the need to maintain flexibility as SRP increasingly integrates these resources and pursues emerging technologies, such as batteries and advanced control systems. Additionally, this proposal encourages customers to take advantage of lower-cost, lower-emissions energy through enhancements to SRP's time-of-use price plan options.

Detailed information on the proposal can be found at <u>Pricing process documents</u> and materials | SRP.

# Name: Cara Rickard

**Record Number:** 638494c9

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

**Comment:** 

Please explain why people with solar will have higher prices when we're generating more of our own power and using less of SRP's? That seems counter intuitive and punishes people with solar.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#638494c9

#### Cara Rickard,

SRP understands that rooftop solar panels can be a significant investment and appreciates your commitment to renewable energy. Your SRP bill will be lower with solar generation than it would be without, though SRP must bill for the amount needed to cover the costs of providing you with electric service. Typically, solar customers continue to rely on SRP for around two-thirds of their electricity needs, especially during peak times when electricity is most expensive.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; those costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism. At the same time, proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

# Name: Kevin Jones

Record Number: d76bf769

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

Comment:

Why don't you cut down on advertising and promotion expenditures and give the customers a break? It's not like we have a choice of who we he's service from anyway. Is all the marketing a tax write off so that you profit more and hit the consumer harder to pad the corporate pockets? I would love a logical explanation as to why you promote yourself so much when you have a controlled consumer base.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#d76bf769

#### Response:

Hi Kevin,

The Salt River Project Agricultural Improvement and Power District (the "District" or "SRP") is organized as an agricultural improvement district under Chapter 17 of Title 48 of the Arizona Revised Statutes. The District is designated a political subdivision of the State of Arizona, and thus does not pay federal or Arizona state income taxes. SRP is a community-based, not-for-profit utility. SRP does not have stockholders or pay dividends; revenues are reinvested back into our electric grid for the benefit of all customers.

SRP advertises in our service territory to achieve our corporate objectives. These efforts focus on helping our customers reduce costs and enhance their experience by promoting education and enrollment in SRP programs and products.

# Name: JERRY MANGRUM

**Record Number:** cf6dfd05

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

**Comment:** 

I was wondering way the cost is not the same for both solar and non-solar customers. Why has the buy back for solar does not go up along with the cost of the electric?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#cf6dfd05

#### Response:

Jerry Mangrum,

SRP management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

# Name: Rick Temple

Record Number: 3da4b3d1

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

**Comment:** 

As a retired 'EE' who has previously worked for AEP (many, many years ago), I understand SRP's need for increasing the rates - especially since there has been an uncontrolled boom in new housing construction. However, your costs have also increased due to significant load contributed by data ctrs. and mega commercial projects... I no longer have the time or energy to review your plans or calculations as to how you arrived at your currrent proposals so I am hoping that it was done fairly - keeping in mind that a large portion of the population exists on a 'fixed income'. Here are my concerns. \* I am currently on the 'EZ-3' plan and did not see it mentioned specifically in your letter. Is this one of the current plans slated to be eliminated by 2029? \* Please define 'very large electric service entrance'. \* My current MSC is \$20.00. Is that going to stay the same? \* Finally, I'd like to propose a plan to reduce residential consumption and would request your assistence to bring it to fruition. It is a widely proven fact that light surfaces reflect heat and subsequently reduce HVAC electric costs. All my experiences in construction within IBM, Motorola, and others - we always had the bldg. roofs either painted white or covered with reflective ballast. Az. houses are a 'sea of red roofs' and consequently they are not only hotter inside, but contribute to the 'heat island' effect everywhere. I've tried to get our HOA to allow residents to paint the roofs white - but - they cite a state 'BLANKET' law requiring 99% of the residents MUST request any change to the CCR's... The law was intended to prevent a slim (ie: 51%) of the residents from selling out to a developer for commercial purposes and leaving the remaining 49% - SOL! The intent was good but - the state went to far because it was too broad of a scope - not every change is bad and not every change should require a 99% vote approval. As a result, not even 'good' improvements have a chance of getting that kind of a majority - UNLESS, there is an incentive! This is where SRP could make a difference. What about creating a 'usage plan' that rewards folks who paint thier roofs white. Besides first-hand experience, I have done some research on the web and there are studies that claim a 7-10% reduction of HVAC usage by doing this. Additionally, there would also be a reduction of the local 'heat island' effect if all the neighbors did the same. This might appear to be 'wishful thinking' now but - unless something is done soon to reduce our summer 'hell' - there may be a mass exodus to cooler locales and SRP could have a surplus of equipment on its hands. Would appreciate your consideration and feedback, regards, Rick

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#3da4b3d1

#### Response:

Thank you for your questions regarding the SRP' Pricing Process.

SRP is freezing some price plans because the hours that are higher in cost are shifting later into the evening, abundant daytime solar energy allows for super off-peak periods earlier in the day, when energy is cheapest.

Under this proposal, current TOU price plans including EZ-3, will be frozen as of November 2025 and will be eliminated by November 2029. If you are currently on one of those plans, you can stay on that plan until it's eliminated, or you can sooner switch to a different plan.

This proposal includes two new plans that will be open to all types of residential customers, both customers with solar and customers without solar, and includes an 8 a.m. - 3 p.m. super off-peak period where energy is more than 50% lower than our basic plan prices. Both include on-peak hours where energy is more expensive. The E-28 Price Plan for Residential Time-of-Day Service with Super Off-Peak Hours has an on-peak period from 6 – 9 p.m. with no demand charge, and the E-16 Demand Price Plan for Residential Time-of-Use Service has an on-peak period from 5 – 10 p.m., with an average demand charge. SRP will also continue to offer the Basic plan (E-23) and M-Power plan (E-24).

The monthly service charge (MSC) is determined by the type of home in which you live. Dwellings of different types have differences in the cost to serve. In recognition of these differences and to better align prices with costs, SRP management is proposing three tiers of MSC that will apply to all residential price plans based on the type of dwelling and the amperage level of the service:

- Tier 1: \$20 MSC is applicable to a single unit in a multiple family house, an apartment unit, a condominium unit, a townhouse or a patio home with a service entrance of 225 amps or less.
- Tier 2: \$30 MSC is applicable to a dwelling type not listed in Tier 1 with a service entrance of 225 amps or less.
- Tier 3: \$40 MSC is applicable to any residence with a service entrance of more than 225 amps.

You can easily determine if tier 3 applies to you by looking at the meter on the electrical panel (service entrance) of your home. You'll look for the form and class shown on the face of your SRP electric meter and if you see these combinations, then tier 3 will apply:

Form (FM)
Class (CL)
MSC Tier
2S (or 2SE)

320
Tier 3
4S

20
Tier 3
5S

20
Tier 3
9S

Tier 3

You can also go on SRP's website and click Customer Service in the banner at the top, or call SRP's Customer Service department: (602) 236-8888 and a representative can help you determine which MSC tier applies to you. Tier 3 only applies to about 3% of all SRP residential customers.

Thank you for your comments regarding white roofs and energy efficiency.

# Name: Joseph Green

**Record Number:** 711a7a70

**Delivery Method:** Digital Submission

**Received Date:** 12/8/2024

**Comment:** 

Why are Solar customers being penalized with a higher Percentage increase? Non Solar 3.4% Solar 5.9% We already pay a higher Monthly Service Charge (MSC) of \$32.44 compared to non Solar of \$20.00. I understand that connecting Solar is a little more complicated and costs more to install, but after installation there should be no more continuing costs. A one time installation charge would be in order for Solar customers, but not a higher MSC every month. I believe we should not be charged more just because we have Solar. It cost us extra just to get the Solar system and now we pay more just to be on the Grid. Solar reduces the amount of energy we use from the Grid and in most cases energy is sent back to the Grid, which reduces the amount of energy SRP needs to produce to supply the demand.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#711a7a70

#### Response:

Hi Joseph,

SRP management's proposal aligns the monthly service charge (MSC) across all residential price plans; solar customers will have the same MSC as customers without solar. Most solar customers (those on an existing solar price plan) will see their MSC decrease by \$2.44 per month, but depending on the residence, it may decrease by \$5.44 or \$12.44.

Under the proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

# Name: Narayan Shah

**Record Number:** 19021583

**Delivery Method:** Digital Submission

**Received Date:** 12/9/2024

Comment:

We have a rooftop solar system as of 2014 and we were grandfathered at \$20 per month connection fee FOR LIFE. I trust SRP is going to honor that commitment and will not increase the connection fee for us. Please reply to confirm. Thanks.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#19021583

#### Hi Narayan,

As you may recall, in previous pricing processes, grandfathered solar customers (those who originally installed the on-site generation at a residence on or before December 8, 2014, or who (i) by such date, either delivered to SRP a fullyexecuted contract for the installation of the on-site generation or had an SRP Residential Solar Electric Program Application for the on-site generation pending with SRP, and (ii) interconnected the generating facility with SRP's electrical grid by February 26, 2016) were exempted from mandatory participation in one of the price plans designed for solar customers (E-13, E-14, E-15, or E-27). The exemption would be effective, at the residence where the system was originally installed, until the later of (a) March 31, 2025, or (b) the date that is 20 years after the date on which SRP initially interconnected the generating facility on which the exemption is based to SRP's electrical service grid. The exemption runs with the property, such that it will apply to the initial customer of record for the residence and any subsequent customer of record for that same residence. Put simply. grandfathered solar customers would continue to be able to take service on a standard residential plan and the Renewable Net Metering Rider for 20 years from their interconnection.

SRP management is not proposing any changes to the foregoing exemption, except for an extension of the March 31, 2025 date to November 1, 2025.

Note that while the exemption permitted grandfathered customers to stay on a standard residential price plan, it did not fix or limit the prices those customers would pay under those plans. Grandfathered solar customers, like all SRP customers, are still subject to price changes, including changes to the monthly service charge (MSC). SRP management's proposal aligns the MSC across all residential price plans; solar customers will have the same MSC as customers without solar.

# Name: Marilyn Bigney

**Record Number:** e6444570

**Delivery Method:** Digital Submission

**Received Date:** 12/11/2024

Comment:

I don't understand why you charge those with solar more. I was certainly deceived when the solar sales person told me that it would be cheaper!!!!

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#e6444570

#### Response:

Hi Marilyn,

We're sorry to hear that you may have been misled. You may consider calling SRP's Customer Service department at (602) 236-8888 to see if you are on the best Price Plan for your usage.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism. At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

# Name: Shane Bentley

**Record Number:** cde02501

**Delivery Method:** Digital Submission

**Received Date:** 12/11/2024

Comment:

as a single dad with 2 teenagers, my cost of living isn't great. in the summer, I struggle with the \$300+ SRP bills. but there is no where else I can get my power from, so you have me locked down like most people out here. you want to help us? lets get some solar options! i live in a mobile home and own the land here, solar panales in the back yard? help us!

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#cde02501

#### Response:

Shane Bentley,

Over the last decade, the grid has evolved and there is now a low-cost, low-carbon period during daylight hours when solar energy is abundant. SRP management is therefore proposing low-price daytime periods to encourage customer usage during these hours, thereby lowering emissions and costs.

Specifically, SRP management is proposing to simplify SRP's portfolio of Price Plans and bring the super off-peak concept that EV customers currently enjoy to all SRP residential and commercial time-of-use Price Plans. Under the proposal, SRP's two residential time-of-use plans going forward would each include 8 a.m. - 3 p.m. super off-peak prices that are more than 50% lower than basic price plans. The on-peak period would be from 6-9 p.m. or 5-10 p.m., depending on the Price Plan. All proposed commercial and industrial Price Plans that include time-of-use hours would also have a low-price period from 8 a.m. - 3 p.m.

# Name: Steven Neil

Record Number: 2d9468e6

**Delivery Method:** Digital Submission

**Received Date:** 12/11/2024

**Comment:** 

In public meetings about this pricing process, SRP management has stated multiple times the various meetings that are part of the process. One of them is a SEM LI meeting and the calendars have said it will take place on Dec 18, 2024. Where and when is this meeting being held? I plan on attending, so please send your answer as soon as possible, and definitely well in advance of the meeting. This meeting is not displayed on the pages of pricing process webpages like the other meetings are. Why? When will it appear on these pricing process webpages with the other meetings?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#2d9468e6

#### Response:

Hello,

While we appreciate your interest in participating, the December 18 meeting is an invite- only meeting between representatives of SRP management and certain large industrial customers who have dedicated or customer-owned substations and take service under a large general service price plan (E-65/E-66/E-67).

We welcome you to attend one of two open-house meetings scheduled for the public, where you can interact directly with SRP representatives. The information for those two open houses is as follows:

**Tuesday, January 7, from 6:30 to 9:30 p.m.** Glendale Community College - Student Union 6000 W Olive Ave. Glendale, AZ 85302 (Parking located off 61st Ave.)

Thursday, January 9, from 6:30 to 9:30 p.m.

ASU Polytech - Student Union 5999 S Backus Mall Mesa, AZ 85212 (Free parking in Lot 10)

Thank you again for your message. SRP

# Name: Steven Neil

Record Number: 2d9468e6

**Delivery Method:** Digital Submission

**Received Date:** 12/11/2024

**Comment:** 

This request is in reply to "SRP Corporate Pricing Response to Public Comment #2d9468e6" sent to me 12-16. I need to know why you displayed content and spoke of this SEM LI meeting multiple times in open meetings and never distinguished it as not being a meeting open to the public like all the other events on the pricing process calendar slide. And if you will state, in reply to this message, that in your next meeting with the board of directors and in future pricing processes, you will continue to show non-open meetings on the pricing process calendar, but clearly state it was and is for certain customers only and is not a meeting where any matters have or will be heard or discussed or voted on by any elected official(s) of SRP, I will not file an open meeting law complaint. Please reply on or before 12-27-24, 10 days from now.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#2d9468e6

#### Response:

Steve,

In response to comment #2d9468e6 (referenced below), there are currently two open houses for all interested parties, and separately four public open meetings of the SRP Board listed in the posted legal notice for the current price process, and published on the SRP Price Process website.

Open houses will be held on January  $7^{th}$  and  $9^{th}$ , and these are not public open meetings of the SRP Board of Directors and will not be attended by a quorum of Board members.

Noticed open public meetings of the SRP Board of Directors as identified under the Arizona open meeting requirements will take place on January 31, February 6<sup>th</sup>, February 11<sup>th</sup>, and February 27<sup>th</sup>. These meetings will have a quorum of Board members present.

Below is the slide that you referenced as discussed in the October 29, 2024 Board Work Study session, which outlined draft steps in the price process. Reviewing the slide it appears that Public Open Meetings of the Board were identified on the top of the timeline while, notices, open houses, and other process steps were listed below that timeline. I understand your concern and confusion that differentiation between public open meeting of the SRP Board of Directors and other process

steps was not made more clearly in the text of the slide, and management has agreed to improve that distinction in future presentations.

The SEM/LI meetings that you identified on the slide was similar to management's planned open houses for broader customers groups, but by invitation to a narrow group of customers for specific rate plans. No SRP Board members were invited or present, and this activity would not qualify as a public open meeting of the SRP Board of Directors.

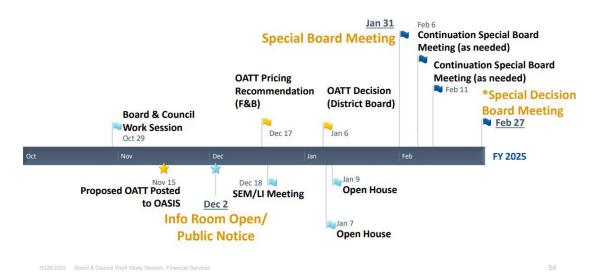
I appreciate your suggestion to improve the transparency of the process and please let me know if this does not address your concern.

Thanks,

John

John M. Felty | SRP Corporate Secretary
Mail Station PAB215 | P.O. Box 52025 | Phoenix, AZ 85072-2025

#### **DRAFT Price Process Calendar**



203

# Name: Brittany Smith

Record Number: 9b46ba8d

**Delivery Method:** Digital Submission

**Received Date:** 12/12/2024

**Comment:** 

If I buy, install a solar system and responsible for all maintenance costs of it, then why would I be charged a higher percentage rate by SRP? This does not make sense.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#9b46ba8d

#### Hi Brittany,

SRP understands that rooftop solar panels can be a significant investment and appreciates your commitment to renewable energy. Your SRP bill will be lower with solar generation than it would be without, though SRP must bill for the amount needed to cover the costs of providing you with electric service. Typically, solar customers continue to rely on SRP for around two-thirds of their electricity needs, especially during peak times when electricity is most expensive.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism. At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

# Name: Mary Sanchez

Record Number: 71ad40ed

**Delivery Method:** Digital Submission

**Received Date:** 12/13/2024

Comment:

We middle to lower income customers are getting hit from everywhere! Now we have this Public Price Process to support updates to the electric grid. What are we supposed to choose from updating the grid or putting food on the table? I am strongly asking that we do not get a price increase. I have followed all recommendations to lower my energy costs. However, it still is high for one person on Social Security. I want to make sure I receive any information on public meetings so I can attend.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#71ad40ed

Response:

Hi Mary,

Thank you for reaching out.

Our public meeting information is posted on our website. Please visit <u>SRP power pricing and rates process | SRP</u> for additional information on our public meetings.

In addition, for more information about savings and our customer programs, including program eligibility and enrollment processes, please <u>go on SRP's</u> <u>website</u> and click Customer Service in the banner at the top, or call our Customer Service department: (602) 236-8888.

# SRP Public Price Process Responses from: 12/17/2024

Name: Timothy Keister

**Record Number:** e111a02b

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

My solar system output exceeds my use 100% of the time with excess power going to SRP. Why am I billed on a monthly basis and only receive payment for excess power once a year? It would make more sense to settle each month which would avoid my paying any taxes.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#e111a02b

#### Response:

#### Timothy Keister,

It sounds like you're referring to the settlement process under the Renewable Net Metering Rider. It is important to note that no solar customer's output always exceeds their instantaneous usage hour by hour, as they continue to rely on SRP at night and other times when the sun isn't shining. In fact, it is quite uncommon for a solar customer to receive less than 50% of their instantaneous usage from SRP. While some customers achieve net-zero status on an annual basis—meaning their total generation surpasses their total usage annually—a very small percentage manage to be net-zero in each billing cycle. The annual settlement allows customers to offset kilowatt-hours at the full retail rate in a subsequent month by carrying the balance forward.

Under the existing solar price plans (E-13, E-14, E-15, and E-27), and the proposed new price plans (E-16 and E-28), which are available to customers with solar, settlements occur for each billing cycle.

# Name: John Oleksey Jr

Record Number: 86c5ef8e

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

A 50% increase in MSC for a single family residential home is ridiculous. That is way too much in a single price adjustment and doesn't seem justified by what is stated in the literature. Perhaps a more measured and tiered approach over several years would be more appropriate. Don't be like APS! And why freeze so many price plans? Even more revenue?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#86c5ef8e

#### Response:

Hi John,

SRP is proposing to increase average residential bills by 3.5% (\$5.64 per month), though actual impacts will vary by price plan and usage. This proposed change to the MSC is factored into the average residential bill increase of \$5.64.

The Monthly Service Charge (MSC) for residential customers is based on a portion of SRP's fixed costs, such as billing, customer service, metering, and distribution facilities. These costs are constant and do not change with the amount of electricity a customer uses. The current cost study estimates that these costs vary between \$35 and \$49 per month depending on the residence, meaning that only part of these costs is recovered through the MSC, with the rest recovered through per-kWh energy charges.

To better adhere to the pricing principles of Cost Relation and Equity and balancing Gradualism, SRP management's proposal includes tiering the MSC for all residential price plans based on the type of dwelling and the amperage level of their service:

- Tier 1: \$20 for single units in multi-family houses, apartments, condos, townhouses, or patio homes with a service entrance of 225 amps or less.
- Tier 2: \$30 for other dwellings with a service entrance of 225 amps or less.
- Tier 3: \$40 for residences with a service entrance of more than 225 amps.

The proposed average increase of 3.5% (\$5.64 per month) for residential customers is an average across all residential customers and reflects all proposed price changes. The average impact for each proposed monthly service charge

#### (MSC) tier is:

- Tier 1 (\$20 MSC): Average monthly bill decrease of \$0.35
- Tier 2 (\$30 MSC): Average monthly bill increase of \$8.80
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.40

Under the proposal, while the average residential MSC for all three tiers together is increasing, the per-kWh energy price, on average, is decreasing. Individual impacts of the proposal, even within the same MSC tier, will vary depending on price plan and usage.

The reason SRP is freezing some price plans is because changes in the grid have shifted higher and lower-cost hours. As the grid changes, the hours that are higher in cost are shifting later into the evening, causing current time-of-use price plans with earlier on-peak periods to be less aligned with costs. Additionally, grid changes support the adoption of super off-peak periods earlier in the day, when energy is at some of the lowest cost. The proposed new residential price plans (E-16 and E-28) shift on-peak periods to evening hours and introduce a low-priced, super off-peak period during the morning and afternoon hours of 8 a.m. – 3 p.m.

For more details on the pricing proposal, please visit <u>Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle.</u>

# **Name: Matt Haines**

**Record Number:** 0664bfe7

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

Comment:

I don't understand why my connection fee should go up by 50%. SRP hasn't provided any new equipment to my house for the 15 years I've been there. How is an apartment equipped any cheaper than a single family dwelling? When you increase the connection fee, there is nothing I can do to help lower my cost. As a single income home, this makes things more difficult.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#0664bfe7

#### Response:

Thank you for submitting your question regarding SRP's pricing process.

SRP is proposing to increase average residential bills by 3.5% (\$5.64 per month), though actual impacts will vary by price plan and usage. This proposed change to the MSC is factored into the average residential bill increase of \$5.64.

Regarding your question about apartments, they typically cost less to serve than a single family home because they require less conduit and conductor to serve one structure with multiple units compared to running conduit and conductor to serve each individual detached home.

The Monthly Service Charge (MSC) for residential customers is based on a portion of SRP's fixed costs, such as billing, customer service, metering, and distribution facilities. These costs are constant and do not change with the amount of electricity a customer uses. The current cost study estimates that these costs vary between \$35 and \$49 per month depending on the residence, meaning that only part of these costs is recovered through the MSC, with the rest recovered through per-kWh energy charges.

To better adhere to the pricing principles of Cost Relation and Equity and balancing Gradualism, SRP management's proposal includes tiering the MSC for all residential price plans based on the type of dwelling and the amperage level of

#### their service:

- Tier 1: \$20 for single units in multi-family houses, apartments, condos, townhouses, or patio homes with a service entrance of 225 amps or less.
- Tier 2: \$30 for other dwellings with a service entrance of 225 amps or less.
- Tier 3: \$40 for residences with a service entrance of more than 225 amps.

The proposed average increase of 3.5% (\$5.64 per month) for residential customers is an average across all residential customers and reflects all proposed price changes. The average impact for each proposed monthly service charge (MSC) tier is:

- Tier 1 (\$20 MSC): Average monthly bill decrease of \$0.35
- Tier 2 (\$30 MSC): Average monthly bill increase of \$8.80
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.40

Under the proposal, while the average residential MSC for all three tiers together is increasing, the per-kWh energy price, on average, is decreasing. Individual impacts of the proposal, even within the same MSC tier, will vary depending on price plan and usage.

We also offer Budget billing, a program designed to make your monthly energy bills more predictable and manageable. Instead of having high bills in the summer and low bills in the winter, Budget Billing averages out your energy cost over the year. This means you pay about the same amount each month, making it easier to budget. For more details on this program, please visit <a href="Budget Billing for residential customers">Budget Billing for residential customers</a> | SRP For more information on how your electric bill may change based on the proposed change in your price plan, please call SRP's Customer Service department at (602) 236-8888.

# Name: Joseph Bonamo

Record Number: 9184cc82

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

It is ridiculous to increase the Monthly Service Charge \$10.00 (that is an 50% increase of what we pay now) across the board!!! I am a single senior customer who lives in a 1300 sq. ft. single family home and don't use much electricity. All increases should be based on usage!!! Instead Utility companies are just increasing "service charges" to generate more revenue! That is socialism at its best!! The Town of Gilbert did the same thing for water by assessing everyone a "meter charge" across the board. Why should low usage customers have to support high usage customers??? These across the board service charges hurt seniors and the poor the most!! A \$10.00 MSC increase just shows that SRP doesn't really care!!!

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#9184cc82

Thank you for submitting your question regarding SRP's pricing process.

SRP is proposing to increase average residential bills by 3.5% (\$5.64 per month), though actual impacts will vary by price plan and usage. This proposed change to the MSC is factored into the average residential bill increase of \$5.64.

The Monthly Service Charge (MSC) for residential customers is based on a portion of SRP's fixed costs, such as billing, customer service, metering, and distribution facilities. These costs are constant and do not change with the amount of electricity a customer uses. The current cost study estimates that these costs vary between \$35 and \$49 per month depending on the residence, meaning that only part of these costs is recovered through the MSC, with the rest recovered through per-kWh energy charges.

To better adhere to the pricing principles of Cost Relation and Equity and balancing Gradualism, SRP management's proposal includes tiering the MSC for all residential price plans based on the type of dwelling and the amperage level of their service:

- Tier 1: \$20 for single units in multi-family houses, apartments, condos, townhouses, or patio homes with a service entrance of 225 amps or less.
- Tier 2: \$30 for other dwellings with a service entrance of 225 amps or less.
- Tier 3: \$40 for residences with a service entrance of more than 225 amps. The proposed average increase of 3.5% (\$5.64 per month) for residential

customers is an average across all residential customers and reflects all proposed price changes. The average impact for each proposed monthly service charge (MSC) tier is:

- Tier 1 (\$20 MSC): Average monthly bill decrease of \$0.35
- Tier 2 (\$30 MSC): Average monthly bill increase of \$8.80
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.40

Under the proposal, while the average residential MSC for all three tiers together is increasing, the per-kWh energy price, on average, is decreasing. Individual impacts of the proposal, even within the same MSC tier, will vary depending on price plan and usage.

For more details on the pricing proposal, please visit <u>Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle.</u>

# Name: Charles L Wilkinson Sr

Record Number: cf7fc6da

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

Comment:

Please resolve my confusion for MSC service increase of \$10 (residential \$20 to \$30) (a 50% increase in MSC) and the states average of 3.5% (\$5.64 average increase per residential home in the new pricing plan. If there is going to be a 50% increase in the service fee, now does this relate to 3.5% average increase for all single family homes without solar?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#cf7fc6da

Response:

Thank you for submitting your question regarding SRP's pricing process.

Your monthly service charge (MSC), which helps cover costs of customer service, billing, and your connection to the grid, is \$20.00 today (or perhaps \$32.44 or \$45.44 if you're a solar customer). This proposal includes a tiered MSC for all price plans:

- If you're in a multi-family home (apartment, condo, townhome), it stays at \$20.00
- If you're in a typical single-family home, it is \$30.00
- If you're in a home with a very large electric service entrance, it is \$40.00. About 3% of SRP residential customers fall into this category.

The proposed average increase of 3.5% (\$5.64 per month) for residential customers is an average across all residential customers and reflects all proposed price changes. The average impact for each proposed MSC tier is:

- Tier 1 (\$20 MSC): Average monthly bill decrease of \$0.35
- Tier 2 (\$30 MSC): Average monthly bill increase of \$8.80
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.40

Under the proposal, while the average residential MSC for all three tiers together is increasing, the per-kWh energy price, on average, is decreasing. Individual impacts of the proposal, even within the same MSC tier, will vary depending on price plan and usage.

For more details on the pricing proposal, please visit <u>Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle.</u>

# Name: Mike Burns

Record Number: cb74867b

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

Comment:

Are any residential energy rates EVER affected by any commercial rate adjustments? My summer energy rates, at times exceed \$200.00 per month and that seems to be directly related to the use of our 3-ton heat pump. I am sure many energy saving steps would lower this somewhat and at 7-8 years of age this unit may need to be replaced soon and that will help? But is there an easy cost to savings one could look at see any potential savings? Thanks

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#cb74867b

## Response:

Hi Mike,

For cost allocation purposes, SRP partitions customers into a distinct class when customers are easily identifiable and when they have usage patterns similar to each other and distinct from other classes. For this reason, commercial and residential rates typically do not affect one another as they have distinct cost differences between them which leads to them being priced differently. To learn more about how we determine the cost to serve each customer class, please visit Cost Allocation Study in Support of Proposed Adjustments Effective with the November 2025 Billing Cycle.

Regarding your question on energy savings, the pricing proposal introduces two new price plans that include an  $8 \, \text{a.m.} - 3 \, \text{p.m.}$  super off-peak period every day of the year, where energy costs are more than 50% lower than on the basic plan. You may be able to save by choosing a time-of-use Price Plan and shifting electricity usage away from the on-peak period and into the super off-peak period.

SRP also offers services to help you identify opportunities to save energy and reduce your electricity bill. Please visit <u>SRP Home Energy Audit rebate | SRP</u> for more details or call SRP's Customer Service department at (602) 236-8888.

# Name: Chris Teel

Record Number: b3e6071e

**Delivery Method:** Digital Submission

**Received Date:** 12/9/2024

Comment:

Help me to understand why solar customers pay more. I also need help understanding what will happen to the EV plan. Thank you.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#b3e6071e

#### Response:

Chris Teel,

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; those costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism. At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

The existing EV Price Plans (E-14 and E-29) will be frozen. Freezing a price plan means that it will no longer be offered to new customers. Under this proposal, to simplify pricing, certain existing time-of-use (TOU) price plans will be frozen as of the November 2025 billing cycle and will be eliminated by the November 2029 billing cycle. If you are currently on one of those plans, you can stay on that plan until it's eliminated, or you can sooner switch to a different plan, including, starting in the November 2025 billing cycle, one of the two proposed new TOU options (E-16 and E-28).

Over the last decade, the grid has evolved and there is now a low-cost, low-carbon period during daylight hours when solar energy is abundant. SRP management is therefore proposing low-price daytime periods on E-16 and E-28 to encourage customer usage during these hours, thereby lowering emissions and costs.

Specifically, SRP management is proposing to simplify SRP's portfolio of Price Plans and bring the super off-peak concept that EV customers currently enjoy to the SRP residential E-16 and E-28 Pric Plans and all commercial time-of-use Price Plans. Under the proposal, SRP's two residential time-of-use plans going forward would each include 8 a.m. -3 p.m. super off-peak prices that are more than 50% lower than basic price plans. The on-peak period would be from 6-9 p.m. or 5-10 p.m., depending on the Price Plan. All proposed commercial and industrial Price Plans that include time-of-use hours would also have a low-price period from 8 a.m. -3 p.m.

# Name: Gail Pamela Vavrica

**Record Number:** eb690456

**Delivery Method:** Digital Submission

**Received Date:** 12/12/2024

Comment:

I am not pleased with the rate increase. What can be done to mitigate the costs to residents affected by this? Why is this even taking place. We already pay enough especially during the summer.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#eb690456

#### Response:

Thank you for your response and voicing your concerns.

SRP management is proposing price changes intended to account for rising costs, ensure that SRP maintains its long-term financial health, and reflect SRP's continued transition to sustainable resources and new technologies. The price proposal reflects, among other things, an increase in base prices to address expenses related to replacing aging infrastructure, adapting to an evolving power grid, and enhancing customer programs and services, while maintaining reliability and safety.

SRP offers various options available to help customers save on their bill. One such option is the Economy Price Plan, which provides a discount for customers with limited incomes. SRP management is proposing an expansion to, and increase of, our limited income discount, expected to make over 100,000 more customers eligible for a \$25 per month credit to their bills.

In addition, included in SRP management's proposal are two new price plans that include an 8 a.m. – 3 p.m. super off-peak period every day of the year, where energy costs are more than 50% lower than on the basic plan. You may be able to save by choosing a time-of-use Price Plan and shifting electricity usage away from the on-peak period and into the super off-peak period.

For more information about savings and our customer programs, including program eligibility and enrollment processes, please go on SRP's website and click Customer Service in the banner at the top, or call our Customer Service department: (602) 236-8888

# SRP Public Price Process Responses from: 12/18/2024

Name: Patricia Pierce

**Record Number:** 659a7ecc

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

Is any additional funding needed, or planned, to increase cybersecurity for our electric grid? I appreciate the information in the SRPnet blog: bsrp participates gridex

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#659a7ecc

#### Response:

Hi Patricia,

All critical infrastructure sectors, including utilities, are in a unique time of rapidly changing technology and increasing sophistication of cyber attackers. SRP makes cyber security a top priority by investing in people, processes, and technologies to secure the electric grid and corporate operations. Although SRP does not publicly discuss its existing or future cyber security initiatives, there are various budgetary items planned to help maintain or improve SRP's cyber resilience against these evolving threats and ensure the safe and secure delivery of electricity to our customers.

Thank you for your question and your interest in SRP.

# SRP Public Price Process Responses from: 12/19/2024

Name: Jason Gibble

Record Number: 12f36dad

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

#### Comment:

I oppose any and all changes that will increase our bills. How about you pay your engineers less? How about not putting so many logos and stickers on vehicles out in the field? How about not reimbursing employees for boots? How about working with business in the area to decrease their consumption? They can turn lights off or not have all the damn lights on (Walmart, Target, Lowe's, Home Depot, on and on), lower their AC, pool and fountains can be set to run less. There are so many ways to save customers money. These same activities can save SRP money. What about partnering with APS for the benefit of both companies and more importantly, the area residents to help them with the ridiculous bills we get, especially in the summer. It's crazy that my bill is \$60 right now and in the summer months it balloons to \$300 and that's with me being very careful with summer consumption because rates triple. How about working with the state on solutions to become more efficient? How about working with law enforcement to better patrol intersections and start giving tickets to those running red lights, speeding on all of our streets, endangering SRP employees, their families and friends. Have your executives taken pay cuts? Why do you keep asking us to sacrifice? Start at the top, set the example and then maybe ask us to pay more. You're giving employees big raises and slap us in the face with more fees, that's unacceptable. I doubt any of this will matter, you all will stick it to us, and we have no option but to continue service, but just maybe this will help SRP actually make a positive impact for residents of the valley.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#12f36dad

## Response:

Thank you for sharing your perspective regarding the price process and providing your questions about how SRP is helping to manage energy usage and reduce costs for our customers. We appreciate your interest in this important topic.

We understand that rising energy costs can be challenging, and we want to

assure you that SRP is committed to helping our customers manage their energy usage and costs effectively. SRP fields a robust and comprehensive portfolio of energy efficiency initiatives designed to help customers reduce their energy consumption and save money. These initiatives include:

- Educational Resources: SRP provides tips and tools to help all customers understand and manage their energy use.
- Price Plan Options: SRP provides various price plans to suit different usage patterns and help customers save money.
- Bill Assistance Programs: SRP offers a variety of bill assistance programs and resources that can be found at <a href="srp.net/heretohelp">srp.net/heretohelp</a>. SRP's <a href="Budget Billing">Budget Billing</a> program also helps customers manage their monthly expenses by averaging their energy costs throughout the year.
- Energy Assessments and Services: SRP offers online, virtual, and in-person assessments and comprehensive testing and audit services to provide personalized recommendations for customers to improve energy efficiency in their home or business.
- Energy Efficiency Programs: SRP offers rebates and incentives for energyefficient HVAC, lighting, refrigeration, motors, appliances, home or building
  improvements, and more, as well as tips and tools to help customers reduce
  their energy use with little to no capital investment. These programs help
  customers lower their energy bills and reduce their carbon
  footprint. Information about energy efficiency programs for our residential
  customers can be found at <a href="mailto:savewithSRP.com">savewithSRP.com</a>. For more details on how SRP
  supports businesses in their energy efficiency efforts, please visit
  savewithSRPbiz.com.

Using energy efficiently not only helps customers save money, but as a not-forprofit utility, reducing energy demand from customers allows SRP to defer the need for additional generation resources, reduce carbon emissions in alignment with established goals, and ultimately keep costs lower for everyone.

For that reason, you will find Energy Efficiency embedded in SRP's corporate strategy and long-term plans, where it plays a crucial role in SRP's 2035 Sustainability Goals and Integrated System Plan to help SRP deliver affordable, reliable, and sustainable energy to our customers long into the future.

When evaluating price changes, SRP considers the cost to provide electricity, the impact of price increases on customers, and SRP's financial health. SRP continually focuses on controlling costs in the areas of financing, operations and maintenance, and new capital expenditures, while planning to meet future customer needs and working toward meeting SRP's ambitious carbon reduction goals.

SRP must account for prevailing market wages to attract, develop, and retain employees to achieve SRP's 2035 Workforce Objective and also the Customer, Reliability and Sustainability Objectives. SRP wage growth since Fiscal Year 2019

has averaged 3.95% per year.

For additional information related to SRP commercial customers, please visit our website at <a href="https://www.srpnet.com/price-plans/business-electric/overview">https://www.srpnet.com/price-plans/business-electric/overview</a>.

For more details on the pricing proposal, please visit <u>Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle.</u>

# Name: Elizabeth Trembath

**Record Number:** 6c2e6fa5

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

Comment:

Why are solar customers having a larger increase in their monthly service charge when we send solar back to the grid?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#6c2e6fa5

## Response:

Thank you for submitting your question regarding SRP's pricing process.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

# **Name: Scott Beatty**

Record Number: c89e46ab

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

**Comment:** 

Why am I being penalized for having solar. The amount of energy you get from me is pennies on the dollar. This is adsurd.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#c89e46ab

## Response:

Thank you for submitting your question regarding SRP's pricing process.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

# Name: Barbara Weaver

**Record Number:** 0be530a7

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

**Comment:** 

What percentage of our payments goes to management?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#0be530a7

## Response:

Thank you for your question.

In Fiscal Year 2024 (FY24), SRP executive compensation (including salaries & wages, bonuses, dependent tuition reimbursement, and deferred compensation/healthcare reimbursement), was approximately \$9.8M\*. Under SRP management's proposal, in Fiscal Year 2026 (FY26), SRP would collect approximately \$4,384.6M in revenues from customers. Therefore, executive compensation (based on FY24 figures) is approximately 0.22% of proposed revenues in FY26.

\*The SRP executive management team currently consists of the General Manager & Chief Executive Officer and nine Associate General Managers. Transition efforts associated with retirements in FY24 led to a temporary increase in the number of SRP executives; there are 14 executives included in this figure.

# Name: Craig a freeman

**Record Number:** ff6362ca

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

**Comment:** 

I am pleased with the SRP service I recieve. Great Customer service when I need it. Big consumers should pay more. Maybe a premium graduation. How can we keep building so many buildings and houses when we are already in water shortage? SRP needs to tell cities when to stop issuing permits Why are we not doing water conservation plans and monitoring? To many managers and higher staff. Reduce overhead Show cost savings programs. Hiring has increased every year last 4 years. Costs, expenses too. Understood but what is being done go reduce?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#ff6362ca

#### Response:

Thank you for your questions and your interest in SRP.

Each municipality has their own drought response plan that can be implemented based on certain water supply and weather conditions. SRP continually supports Valley cities in their water conservation efforts. SRP is also actively engaged in the local and state policy arenas to ensure our water customers and power generation facilities are not negatively impacted by proposed policies. The State of Arizona is the only state that requires developers to ensure they have a 100year water supply before any development is permitted - a key decision that continues to allow this state to grow while also effectively managing the water supply needs. While the news may seem like water supplies are dwindling under a growing population in Arizona, the fact that the state is using the same amount of water as it did back in the 1950's and 1960's (while the population has exponentially increased since that same time) is a testament to the hard work by the local and state water advisors to ensure the viability and resiliency of living in a desert. The SRP irrigation and delivery system has adequate supplies of water to support our customers, and that is attributed to many decades of prudent water management of our reservoirs and groundwater.

In response to your comment on cost savings, SRP focuses on controlling costs in the areas of financing, operations and maintenance, and new capital expenditures while planning to meet future customer needs and while meeting our ambitious carbon reduction goals.

SRP management continually leads efforts to operate the business in a costeffective and efficient manner while meeting or exceeding annual objectives. Key efforts include:

- Performing on-going investment recovery activities, including selling scrap metal, materials, and assets that are no longer needed for business activities. These efforts brought in over \$14 million in revenue in Fiscal Year 2024.
- Implementing cost-controlling practices within Information Technology (IT) Services, focusing on optimizing the management of IT assets and technology vendors. Since 2021, these efforts have resulted in over \$30 million in cost savings or cost avoidance.
- Ongoing tracking and renegotiation of contracts related to meters, resulting in lower prices for two projects since 2021.
- Upgrading 11 of 12 combined cycle gas units with enhanced turbine hardware, which has enabled improved emissions, increased unit capacity, and reduced heat rate/fuel cost.
- Developing and utilizing asset optimization risk assessments to identify additional, low-risk, 69kV breaker preventative maintenance intervals that could be safely extended from 4 years to 6 years.

# Name: paul pepe

Record Number: 7d153594

**Delivery Method:** Digital Submission

**Received Date:** 12/6/2024

Comment:

Hi I really do not have any issues with you pricing or the way you do the on or off peak times. But I very disappointed in how difficult it is to get 3 Phase service to my home when it is right in my back yard in Mesa, I have inquired a few times and each time I got different prices and reasons , I have had it in other states that I lived, never was a issue, or not much cost? Just wondered if there is a reason you do not like to install it. I had a couple of older homes in Phoenix that had it . Thank you , Paul

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#7d153594

#### Response:

Thank you for your questions and your interest in SRP.

Three phase residential service is not typical for customers served with overhead or underground power lines. Complexity, costs, and customer requirements are several reasons why this is the case in SRP's service territory. SRP's Distribution Design Standard for Three-Phase 120/240 V Residential Service has several minimum requirements that must be met before three-phase service can be evaluated. The requirements include that a customer has a minimum three-phase load of 3 HP or three- ton heat pump or air conditioner. Additionally, the customer's property must be immediately adjacent to an existing overhead three-phase line and be served as follows:

1) Overhead or underground service drop from an overhead three-phase transformer bank, or 2) Overhead service drop from an existing three-phase secondary line. There are additional considerations and potential upgrades that will also be evaluated on a customer-by-customer basis. There are also Distribution Design Cost considerations that will be specific to each customer project. For an additional resource, please see SRP's power and water construction services site here: <a href="https://www.srpnet.com/doing-business/builders-developers-contractors/construction-services">https://www.srpnet.com/doing-business/builders-developers-contractors/construction-services</a>. Project-specific email inquiries can be sent to construction@srpnet.com.

# Name: LaShelle Myers

**Record Number:** 4392bd9c

**Delivery Method:** Digital Submission

**Received Date:** 12/6/2024

Comment:

If you don't already, please consider that it takes a while for the faucet water to get warm during winter months. Can something be done to the pipes to remedy this?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#4392bd9c

## Response:

Thank you for sharing your question with us as we appreciate your feedback.

Regarding your question, SRP does understand the situation that during the winter months, water must remain on for a minute or two until warm water is received to the faucet in your home. This is normal and the duration typically depends on the distance the faucet or other water-consuming appliance is located from your hot water heater. One option you may have to minimize this situation is to install a small circulating pump in the home to speed up to flow of hot water to the faucet or device. A licensed plumber can assist you with this item if you choose to explore it.

# Name: Robert Shreffler

**Record Number:** fe946c48

**Delivery Method:** Digital Submission

**Received Date:** 12/8/2024

Comment:

Making so called upgrades to infrastructure, is anything being proposed to mitigate risk from electric pulse damage (EMP)? It's supposedly a dumb bomb technique that a rouge group can launch against our grid vulnerability. That would make sense to spend money for. REFER TO tinyurl.comtype a slashEMPbyCISA

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#fe946c48

#### Response:

Thank you for your question and your interest in SRP's operations and future plans.

SRP management's price proposal does reflect some low-cost investments to mitigate typical electromagnetic interference (EMI) events. These EMI mitigations are also expected to reduce the impact of electromagnetic pulses. SRP is committed to enhancing the overall resilience and reliability of our electric grid through various infrastructure upgrades and system improvements. Our ongoing efforts include general grid hardening measures, which aim to protect against a range of potential threats and vulnerabilities. These investments are part of SRP's broader strategy to ensure the stability and security of our power supply.

# Name: Gregory Jorgenson

Record Number: 49970f82

**Delivery Method:** Digital Submission

**Received Date:** 12/10/2024

Comment:

1. What has been your SRP infra-structure budget been for the last 5-10 years? 2. Why are you proposing to charge solar customers more? They actually give you power at a wholesale price. 3. How does your Off-Peak plans help limited income seniors afford to stay cool in summer months? 4. What does the SRP board see as it largest challenge in the next 5-10 Years?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#49970f82

### Response:

Thank you for submitting your questions.

In regard to spending on infrastructure, since May 2019, SRP has spent approximately \$2.6 billion on maintenance improvements and replacements of transmission and distribution equipment. SRP's generation assets also require regular maintenance and improvements; from May 2019 to April 2024, SRP spent approximately \$660 million on power plant betterments. Funding for new capital infrastructure comes from three sources: retail electric sales, the issuance of debt and, when available, contributions from wholesale net revenues.

Concerning solar customers, SRP customers who produce some of their own energy still rely on the SRP grid; SRP needs to recover from those customers the costs of providing reliable electric service. Even if a customer generates as much energy as they consume on an annual basis, there are still fixed costs associated with the grid that SRP needs to collect, either by imposing a separate charge, or by excluding grid-related costs from the export rate (making the delivered energy price higher than the export credit).

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers. The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

SRP management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

Both the proposed new residential time-of-use Price Plans include 8 a.m. -3 p.m. super off-peak prices that are more than 50% lower than basic price plans. The on-peak period would be from 6-9 p.m. or 5-10 p.m., depending on the Price Plan. Customers can save money by moving to one of these Price Plans and shifting usage away from the on-peak period and to the super off-peak period.

SRP offers a variety of solutions to help you lower your energy costs and manage your bill. For eligible customers with limited incomes, SRP offers a monthly discount under the Economy Price Plan (EPP). One feature of the pricing proposal is to modify the EPP to raise the eligibility threshold from 150% to 200% of the federal poverty level and to increase the discount from \$23 to \$25 per month.

In regard to challenges faced by SRP in the coming years, SRP expects load growth in the next six years to outpace load growth over the entirety of the last 20 years. Importantly, this growth is expected to be served with an increasing share of sustainable resources, as outlined in SRP's 2035 Sustainability Goals. This will be a unique and challenging time as SRP transitions to sustainable resources while meeting historical growth and maintaining a balance between affordability, reliability, and sustainability.

We appreciate your interest in SRP.

# Name: Tyrone Miller

Record Number: MI6638621

Delivery Method: Mailed to SRP

Received Date: 12/10/2024

Attachments: 20241209 TyroneMiller PriceProcessComment Lette

r.pdf

\*To receive a copy of Attachments please

contact the Corporate Secretary's Office and Reference

Record #MI6638621

#### **Comment:**

#### COVER LETTER

Dear SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT,

I acknowledge receipt of the Legal Notice dated December 2, 2024, regarding the upcoming public process for proposed pricing changes. While I appreciate SRP's efforts to ensure procedural transparency, I believe this notice also presents the opportunity to address broader concerns about SRP's financial practices and obligations.

Specifically, On DEC 2nd I requested to my account supervisor clarity on:

 Whether SRP's billing instruments are derived from Accounts Payable or Accounts

Receivable.

- 2. How SRP accounts for coupon payments and similar methods in its bond and financial operations.
- 3. Why ACH credit payments submitted via Election Letter is constituted as "Debt Avoidance" from SRP, despite aligning with recognized financial standards.

As a customer and beneficial owner under SRP's bond framework, I believe these questions are essential for ensuring fairness and transparency under A.R.S. § 48-2334. I will also submit these concerns as part of the public process outlined in the Legal Notice. Attached are communications to SRP Customer Service and Ombudsman regarding SRP position as a utility company issuing municipal bonds (debt securities). Attached to this correspondence are exhibits that substantiate my position and clarify the relevance of my claims regarding SRP's financial obligations and transparency:

 Affidavit of Facts: Summary of my correspondence and actions to resolve this matter.

- Exhibit 1: Election Letter.
- Exhibit 1a: SRP Response.
- Exhibit 2: Transparency and Acknowledgment Letter to Formal Election Letter.
- Exhibit 2a: Public Bond Notice.
- Exhibit 3: Coupon Payment System Patent (US20050038743A1).
- Exhibit 4: Arizona Corporation Commission Filing, Docket No. E-02217B-22-0208.
- Exhibit 5: SRP Rules and Regulations.
- Exhibit 6: Letter of Instructions and Escrow Deposit Agreement as to Payment of Refunded Bonds.
- Exhibit 7: \$7,000,000 Salt River Project Electric System Revenue Bonds.

I value SRP as my utility provider and wish to resolve this matter collaboratively. However, if these issues remain unresolved, I reserve the right to escalate this matter through the appropriate legal or regulatory channels. Thank you for your time and attention to this matter. Please let me know if any further documentation or clarification is required to facilitate this process.

Sincerely, Tyrone Miller Executor

Response Subject: SRP Corporate Pricing Response to Public Comment #MI6638621

Response:

Mr. Miller,

When SRP bills a customer, it is recorded in Accounts Receivable.

SRP utilizes a Trustee to facilitate payments required under our bonds. Here is an example from our most recent bond issuance:

Link to full document:

https://emma.msrb.org/P31454282-P31129073-P31541711.pdf

SRP does not recognize your letters or any additional documents you have provided as acceptable forms of payment. These documents do not release you from your obligation to pay your SRP balance in full and on time.

The most current billing and payment options available to SRP customers are provided on SRP's website, <a href="www.srpnet.com">www.srpnet.com</a>, or may be requested by phone from SRP's Residential Customer Services Department at (602) 236-8888 or toll free at 1-800-258-4777.

Thank you for your interest in SRP.

# Name: Melissa H

**Record Number:** 560a6482

**Delivery Method:** Digital Submission

**Received Date:** 12/12/2024

Comment:

SRP spends millions on sustainability programs. Who reviews and looks at whether those are cost effective in the first place? APS' programs are reviewed by the ACC, but does any independent third party evaluate SRP's program spending? Can you share how program spend has grown over the years?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#560a6482

Response:

Thank you for reaching out with your question regarding SRP's sustainability programs. We appreciate your interest in understanding how SRP ensures the cost-effectiveness of our initiatives.

SRP's sustainability programs undergo regular and thorough evaluations to assess their impact and value, and SRP is committed to following industry best practices in the measurement and evaluation of our programs. To ensure transparency and accountability, SRP engages independent third-party Measurement, Verification, and Evaluation consultants. These experts audit SRP program results and conduct comprehensive cost-effectiveness analyses. This process aligns with the rigorous industry protocols and practices used by utilities regulated by local utility commissions, such as the Arizona Corporation Commission. Aside from confirming the cost-effectiveness of our efforts, the ongoing evaluations help SRP make informed decisions and continuously enhance the value for participants, while supporting SRP's broader efforts to deliver reliable, affordable, and sustainable energy to all customers.

Regarding the growth of program spending, SRP has consistently increased its investment in sustainability initiatives over the years. This growth reflects SRP's ongoing commitment to achieving our 2035 Sustainability Goals, which include reducing our carbon footprint, enhancing the resiliency of the Valley's water supply, and supporting SRP customers with a variety of programs. Detailed information about recent program spending and progress can be found in the 2024 Customer Programs Report, which is publicly available on SRP's website.

We hope this information assures you of our dedication to maintaining high standards in our sustainability efforts.

# SRP Public Price Process Responses from: 12/20/2024

Name: Tracy Monaghan

**Record Number:** bcdca1b7

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

Not sure how this new plan(s) is going to affect me. I'm hoping that it's not going to cause a rate increase. I'm already struggling. But whatever the complicated scheme is, it will likely will raise electricity costs, again. Ugh!!!! I couldn't even understand what the plans mean. ..... How much profit did SRP report in 2023-24? How much money do the CEO's and CFO's and all other high-level management make annually? How much money are their bonuses? You can bet it's a lot!!! I'm retired and living on a fixed income. I'm not getting any bonuses or probably raises.... but the cost of electricity keeps going up. I'm fairly certain that I'm venting to AI or another non-human entity, which is disappointing, but at least I'm getting my opinion out there somewhere......

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#bcdca1b7

#### Response:

Tracy,

Thank you for submitting your questions and for your interest in SRP.

For more information on how your electric bill may change based on the proposed changes, please call SRP's Customer Service department at (602) 236-8888.

To review SRP's most current financial report, for May 2023-April 2024 (Fiscal Year 2024), please see 2024 Combined Financial Statements.

SRP's Combined Net Revenue for Fiscal Year 2024 was approximately \$406 million. SRP is a community based, not-for-profit utility. SRP does not have any stockholders or pay dividends; revenues are reinvested back into our electric grid for the benefit of all customers.

For Fiscal Year 2024, executive compensation, itemized as set forth below, totaled approximately \$9.2 million\*:

In millions
Salaries & Wages
\$ 7.3
Bonus
\$ 0.6
Dependent Tuition Reimbursement
\$ 0.1
Deferred Comp/Healthcare Reimbursement
\$ 1.2
Total
\$ 9.2

\*The SRP executive management team currently consists of the General Manager & Chief Executive Officer and nine Associate General Managers. Transition efforts associated with retirements in Fiscal Year 2024 led to a temporary increase in the number of SRP executives; there are 14 executives included in this figure.

SRP offers a variety of solutions to help you lower your energy costs and manage your bill. For information about savings and SRP's customer programs, including program eligibility and enrollment processes, please go on SRP's website and click Customer Service in the banner at the top, or call SRP's Customer Service department: (602) 236-8888.

240

Name: Martin

Record Number: 288481cb

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

**Comment:** 

The changes you are proposing are unfortunately very high level. I think individual customers would want to see how changes affect them directly. E.g. with freezing certain plans, I am personally not quite clear what this means: Will I remain on the current plan forever (here Customer Generation Plan)? Or will I be forced onto a new plan? If it means being forced onto a new plan, how exactly does the new one compare to the old one (ideally I would want to see a side-by-side comparison)? Right now, the only specific (residential) change I can identify is a (hefty) 25% Monthly Service Charge increase to \$40 (from \$32.44). Additionally, in between the lines I seem to have identified that time of use hours are about to change, but are on-peak and off-peak hours affected as well for Customer Generation Plans? In general, I feel that the provided information is very high level and unspecific and better transparency about how changes affect individuals would be greatly appreciated.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#288481cb

Response:

Hi Martin,

Thanks for reaching out. I'll go through your questions in order.

Freezing a price plan means that it will no longer be offered to new customers. Under this proposal, to simplify pricing, certain existing time-of-use (TOU) price plans will be frozen as of the November 2025 billing cycle and will be eliminated by the November 2029 billing cycle. If you are currently on one of those plans, you can stay on that plan until it's eliminated, or you can sooner switch to a different plan, including, starting in the November 2025 billing cycle, one of the two proposed new TOU options (E-16 and E-28). Under the proposal, SRP will continue to offer the Basic plan (E-23) and M-Power plan (E-24).

SRP is freezing some price plans as part of the effort to simplify and modernize SRP's portfolio of residential price plans. The proposal freezes the existing suite of time-of-use (TOU) plans and introduces two new TOU plans (E-28 and E-16) because changes in the grid have shifted higher and lower-cost hours. As the grid changes, the hours that are higher in cost are shifting later into the evening, making TOU price plans with earlier on-peak periods less useful. Additionally, grid changes support the adoption of super off-peak periods earlier in the day, when energy is at some of the lowest cost. The proposed E-16 and E-28 price plans shift on-peak periods to evening hours and introduce a super off-peak period during the hours of 8 a.m. – 3 p.m.

If your monthly service charge (MSC) is \$32.44 today, it will change to \$30.00, not \$40.00. Customers who currently have a \$45.44 MSC will change to \$40.00.

For a comparison of the rates, please visit <u>Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle</u>. The two new rates, E-16 and E-28 are on page 61 and 91 respectively.

# Name: Summer

**Record Number:** fb7b3479

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

**Comment:** 

Why raise the rates? Prices are already high and unaffordable and hiking them up just puts more people out on the streets unable to pay bills to survive. Raising rates to out more money in SRP's pocket is not the answer. Trying to force solar is not the answer either since that is unaffordable to purchase as well.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#fb7b3479

#### Response:

Hi Summer,

Thank you for the comments.

SRP management is proposing price changes intended to account for rising costs, ensure that SRP maintains its long-term financial health, and reflect SRP's continued transition to sustainable resources and new technologies. The price proposal reflects, among other things, an increase in base prices to address expenses related to replacing aging infrastructure, adapting to an evolving power grid, and enhancing customer programs and services, while maintaining reliability and safety.

This proposal introduces two new time-of-use (TOU) plans, available to all residential customers, with  $8\,AM-3\,PM$  super off-peak prices that are more than 50% lower than basic plan prices, and designed to offer savings to customers who can shift energy usage:

This proposal also includes an expansion to, and increase of, our limited income discount, making an estimated 100,000 + more customers eligible for a \$25 a month credit through the Economy Price Plan.

# Name: Dale Shamp

**Record Number:** 89ec5776

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

No more increases are needed and should not be passed. People are being put into severe financial problems ever since the Covid period began, and it is still going on. How are people supposed to eat, work two or more jobs, can't pay bills on time, etc. One question I have is how much of the present SRP monies go to administrative and executive costs?? I will vote against any increase!

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#89ec5776

Response:

Thank you for your interest in SRP.

For the most recent fiscal year, ending April 30th, 2024 (FY24), Administrative and General Expenses totaled \$291 million.

For FY24, executive compensation, itemized as set forth below, totaled approximately \$9.2 million\*:

In millions
Salaries & Wages
\$ 7.3
Bonus
\$ 0.6
Dependent Tuition Reimbursement
\$ 0.1
Deferred Comp/Healthcare Reimbursement
\$ 1.2
Total
\$ 9.2

\*The SRP executive management team currently consists of the General Manager & Chief Executive Officer and nine Associate General Managers. Transition efforts associated with retirements in FY24 led to a temporary increase in the number of SRP executives; there are 14 executives included in this figure.

SRP offers a variety of solutions to help you lower your energy costs and manage your bill. For information about savings and SRP's customer programs, including program eligibility and enrollment processes, please go on SRP's website and click Customer Service in the banner at the top, or call SRP's Customer Service department: (602) 236-8888.

# Name: Adam Kennel

Record Number: 147efe61

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

You want to increase more for solar customers? How does that make sense? The people using less power, you want to charge more? That's dumb and doesn't support the shift to solar. This is another reason why SRP is a terrible company.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#147efe61

## Response:

Hi Adam,

Thanks for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

# Name: walter david ford

**Record Number:** f9700c13

**Delivery Method:** Digital Submission

Received Date: 12/2/2024

**Comment:** 

Now that the election is over and the price of oil ,LNG and fuel are expected to drop have youany plan to announce your savings and to lower your Fees

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#f9700c13

## Response:

Hello Walter.

SRP regularly monitors forecasted fuel costs and takes them into account when considering price adjustments. In fact, the current proposal includes a reduction to the fuel and purchased power component of prices.

SRP recovers the cost of fuel for generating stations as part of our Fuel and Purchased Power Adjustment Mechanism (FPPAM). The FPPAM also recovers the costs of power we purchase through contracts and on the market to meet system reliability needs. Because this price component is a straight pass-through that recovers exact costs of fuel and power purchases over time, SRP tracks a balance of this recovery, which has been in a deficit since the COVID-19 pandemic. Because we anticipate recovering the FPPAM balance close to November 2025, when proposed price changes would go into effect if approved by the Board, the pricing proposal includes a reduction to the FPPAM component of prices which partially offsets the increase in base prices. SRP Management is proposing an overall net increase of 2.4%, which is comprised of an increase of 4% through base prices (essentially, everything but the FPPAM) and a decrease of 1.6% through the FPPAM price component.

Thank you for your inquiry and interest in the Pricing Process.

# Name: Arabah Woodberry

Record Number: 1b3ae639

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

**Comment:** 

Trying to understand the plan changes. Will the charges negatively impact those with solar the most? Charges are already extremely high for our plan and not seeing the cost benefit.

Response Subject: SRP Corporate Pricing Response to Public Comment

#1b3ae639

Response:

Hi Arabah,

This proposal includes changes to all of our price plans, and includes an average 5.9% increase for solar customers. This proposal includes more than just the price increase, including several changes to solar price plans including two new options.

The proposal includes two new price plans that will be open to all types of residential customers (both customers with solar and customers without solar), each of which includes an 8 a.m. - 3 p.m. super off-peak period where energy is more than 50% lower than SRP's basic plan prices. Both include on-peak hours where energy is more expensive; one plan has an on-peak period from 6-9 p.m. and the other has an on-peak period from 5-10 p.m., with an average demand charge. Each of these proposed price plans provides the rate at which SRP will credit the customer for energy exported to SRP.

If you are currently on a price plan that will be eliminated under this proposal, you can stay on that plan until it's eliminated, or you can sooner switch to a different plan, including, starting in the November 2025 billing cycle, one of the two proposed plans described above.

Your monthly service charge (MSC), which helps cover costs of customer service, billing, and your connection to the grid, is \$20.00 today (or perhaps \$32.44 or \$45.44 if you're a solar customer). This proposal includes a tiered MSC for all price plans:

- If you're in a multi-family home (apartment, condo, townhome), it stays at \$20.00
- If you're in a typical single-famion those plansly home, it is \$30.00
- If you're in a home with a very large electric service entrance, it is \$40.00.
   About 3% of SRP residential customers fall into this category.

This proposed change to the MSC is factored into the average residential bill increase of \$5.64.

## Name: Ronald Souder

Record Number: d793bea2

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

Why am I not receiving a check for my surplus solar generation instead of a price increase??? This is very upsetting and unfair. You are part of the problem!!! Complete and utter nonsense.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#d793bea2

Response:

Hi Ronald,

Thank you for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

# Name: Roger Storms

Record Number: 485f438c

**Delivery Method:** Digital Submission

Received Date: 12/2/2024

**Comment:** 

I've looked at the information and it is so complicated that it unreasonable for you to believe a normal person could understand. Is it that you couldn't simplify it or do you not want to simplify it? Could you tell me based on my usage how much my rate and bill will be each month?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#485f438c

#### Response:

Hi Roger,

Thanks for reaching out.

This proposal increases average residential bills by 3.5% (\$5.64 per month), though actual impacts will vary by price plan and usage.

3.4% average increase (\$5.51 per month) for residential customers without solar

5.9% average increase (\$7.93 per month) for residential customers with solar

For more information on how your electric bill may change based on the proposed change in your price plan, please call SRP's Customer Service department at (602) 236-8888. For more details on the pricing proposal, please visit <a href="Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle">Proposed Plans Effective with the November 2025 Billing Cycle</a>.

## Name: Jason M Green

Record Number: 037db8d9

**Delivery Method:** Digital Submission

**Received Date:** 12/2/2024

Comment:

Why is the proposal for solar higher than non solar residence? Everything srp has done for solar doesn't make sense! For new residents it's almost not worth getting solar for sure now with the new proposed price hike it won't be any savings.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#037db8d9

#### Response:

Hi Jason,

Thanks for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

## Name: Kenneth G Hummel

**Record Number:** db963de7

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

Comment:

Why is the rate increase for solar customers higher than that for non-solar customers? Why is their no increase in price for excess solar power sent to the grid? This will be my first comment for this most recent rise in prices.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#db963de7

#### Response:

Hi Kenneth,

Thanks for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

The proposal also includes an increase to the export credit from 2.81 cents to 3.08 cents.

## Name: Maria Shuttleworth

**Record Number:** 3d7fbe94

**Delivery Method:** Digital Submission

**Received Date:** 12/3/2024

**Comment:** 

I find it outrageous that homeowners with solar are to have a larger increase than those without! We are getting penalized for having spent the money to help offset the demand on the grind. It makes me want to disconnect my panels and go back to my non solar status. What is the upside for having solar panels?

Response Subject: SRP Corporate Pricing Response to Public Comment

#3d7fbe94

Hi Maria,

Thank you for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

SRP understands that rooftop solar panels can be a significant investment and appreciates your commitment to renewable energy. Your SRP bill will be lower with solar generation than it would be without, though SRP must bill for the amount needed to cover the costs of providing you with electric service. Typically, solar customers continue to rely on SRP for around two-thirds of their electricity needs, especially during peak times when electricity is most expensive.

The savings on your SRP bill are unrelated to the cost of your solar panels. Whether your SRP bill savings exceed the cost of your solar panels will depend on a variety of factors, including how the panels perform and what you paid for them.

Although it is not part of the pricing proposal, SRP management anticipates, after the conclusion of the pricing process, developing and seeking Board approval for a new residential solar program that recognizes the benefits of certain environmental attributes. The program will be designed to provide a simple path for residential customers to realize a financial benefit for Renewable Energy Certificates applicable to their solar generation by transferring those environmental attributes to SRP. The program, if approved, will not only support SRP's renewable energy goals, but will also reinforce sustainable energy solutions.

## Name: Chris Hammer

Record Number: a063281e

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

Please specifically describe how and why solar customers will experience a higher price increase.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#a063281e

#### Response:

Hi Chris.

Thank you for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

If this proposal is approved, residential customers will have an average bill increase of 3.5% (\$5.64 per month), though actual impacts will vary by customer class, price plan, and usage. The proposal reflects the following:

3.4% average increase (\$5.51 per month) for residential customers without solar

5.9% average increase (\$7.93 per month) for residential customers with solar

For more information on how your electric bill may change based on the proposed changes, please call SRP's Customer Service department at (602) 236-8888. For more details on the pricing proposal, please visit <a href="Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle">Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle</a>.

## Name: Blaine Le Fevre

Record Number: 11de884d

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

**Comment:** 

As a solar customer, shouldn't we be getting a discount since we are not taxing the grid? You have made it expensive for your solar customers already with your price plans, and now you want to charge us more? Seems like this needs to be raised up to our local government.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#11de884d

#### Response:

Hi Blaine,

Thank you for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

# Name: Emil Jock Vargo

Record Number: 214aecc1

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

Why do I get paid so little for all the extra power produce?

Response Subject: SRP Corporate Pricing Response to Public Comment

#214aecc1

Hi Emil,

Thank you for submitting your question regarding SRP's pricing process.

Customers who produce some of their own energy still rely on the SRP grid; SRP needs to recover from those customers the costs of providing reliable electric service. As an analogy, assume that SRP offered distributed batteries for lease, and that instead of using the grid, you complemented your solar by leasing a battery owned and maintained by SRP. It would be clear that SRP would not be recovering the cost of owning and maintaining the battery if SRP only had a net kWh charge; even if you only ever used energy that you stored, SRP would still have to collect its costs. Similarly, SRP must recover the costs of SRP's distribution, transmission, and generation system. Even if a customer generates as much energy as they consume on an annual basis, there are still fixed costs associated with the grid that SRP needs to collect, either by imposing a separate charge, or by excluding grid-related costs from the export rate (making the delivered energy price higher than the export credit).

The existing E-27 and E-15 Price Plans use the first approach; net metering all energy and charging or crediting for the net amount at the same retail rate but including a separate demand charge to cover grid costs.

The existing E-13 and E-14 Price Plans use the second approach. The price for energy delivered to customers includes both energy-related and grid-related costs, while energy exported to the grid is credited at the avoided cost of solar energy.

SRP management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

# Name: Guy, James

Record Number: 916c00c6

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

I'm still not clear as to why you need the price increase. It would be good to see the projects that SRP is planning, the current income, profits and executive compensation. Why does this increase penalize roof top solar customers with a higher rate increase? Doesn't SRP want more clean energy on their grid even though your compensation for solar power generation is miserly?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#916c00c6

#### Response:

Thank you for your interest in SRP.

For information on SRP's current and planned projects, please refer to the <u>Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle</u> and visit https://www.srpnet.com/grid-water-management/grid-management/improvement-projects.

To review SRP's financials, please see SRP's most current Annual Report here <u>2024-annual-report.pdf</u>. SRP is a community-based, not-for-profit utility. SRP does not have stockholders or pay dividends; revenues are reinvested back into our electric grid for the benefit of all customers.

For the most recent fiscal year, ending April 30th, 2024 (FY24), executive compensation, itemized as set forth below, totaled approximately \$9.2 million\*:

Salaries & Wages

\$ 7.3

Bonus

\$ 0.6

Dependent Tuition Reimbursement

\$ 0.1

Deferred Comp/Healthcare Reimbursement

\$ 1.2

Total

\$ 9.2

<sup>\*</sup>The SRP executive management team currently consists of the General

Manager & Chief Executive Officer and nine Associate General Managers. Transition efforts associated with retirements in FY24 led to a temporary increase in the number of SRP executives; there are 14 executives included in this figure.

Concerning your questions about rooftop solar customers, under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers. The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost Relation, and Gradualism. At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16, as detailed below) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per-kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

Renewable resources, such as solar, are an integral part of SRP's resource plans. Over the last decade, the grid has evolved and there is now a low-cost, low-carbon period during daylight hours when solar energy is abundant. SRP management is therefore proposing low-price daytime periods to encourage customer usage during these hours, thereby lowering emissions and costs. Specifically, part of SRP management's proposal is to bring the super off-peak concept that EV customers currently enjoy to the new SRP residential and all commercial time-of-use price plans. Under the proposal, SRP's two residential time-of-use plans going forward (E-16 and E-28) would each include daily 8 a.m. – 3 p.m. super off-peak prices that are more than 50% lower than basic price plans. The on-peak period would be weekdays from 6 – 9 p.m. or 5 – 10 p.m., depending on the price plan. All proposed commercial and industrial price plans that include time-of-use hours would also have a low-price period from 8 a.m. – 3 p.m.

Although it is not part of the pricing proposal, SRP management anticipates, after the conclusion of the pricing process, developing and seeking approval from SRP's Board of Directors for a new residential solar program that recognizes the benefits of certain environmental attributes. The program will be designed to provide a simple path for residential customers to realize a financial benefit for Renewable Energy Certificates applicable to their solar generation by transferring those environmental attributes to SRP. The program, if approved, will not only

support SRP's renewable energy goals, but will also reinforce sustainable energy solutions.

## Name: Elizabeth krapf

Record Number: 3fff28a9

**Delivery Method:** Digital Submission

Received Date: 12/4/2024

Comment:

I think this is totally not okay. We pay so much for power already where in other states at similar temps they don't pay nearly as much. Also solar customers have a higher increase?! We literally provide power to the grid and in exchange we get higher rates and higher increases??? We didn't get solar because we are rich. We got it so we could pay LESS. How is that even fair?? We don't even get to choose what plan we are on because solar customers only get to be on one plan. So not only do we already pay a bill for solar, pay a higher rate, and have to be on a specific plan which penalizes us for having solar, we now get a higher rate increase because we have solar? APS literally gives their customers a discount for having solar. Treat people who are literally providing you a resource better!

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#3fff28a9

Hi Elizabeth,

Thank you for submitting your questions and for your interest in SRP.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers. The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

SRP management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and delivered energy charges as customers without solar, with no additional grid access fees. They can maximize savings by using their generation on-site to offset the full retail per kWh price. Any energy exported to the grid will be credited at an export rate, which is based on real-time market prices for energy.

# Name: Doug Ewald

Record Number: 280bdee1

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

**Comment:** 

They average monthly increase (non-solar customers versus solar customers) penalizes solar customers who have personally invested millions of dollars of their own capital while saving SRP capital of millions of dollars in new infrastructure plus the cost of capital. It seems like the solar customers should be rewarded to encourage non-solar customers to invest while preserving SRP capital. Common sense would tell you the proposed increase should be the opposite of what is stated. An equitable monthly service charge (MSC) increase should align with work to be performed (effort to perform the billing). I fail to understand how the MSC for a multi-family home should be billed less than a single-family home.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#280bdee1

#### Response:

Hi Doug,

Thank you for reaching out.

The monthly service charge (MSC) is determined by the type of home in which you live. Dwellings of different types have differences in the cost to serve. In recognition of these differences and to better align prices with costs, SRP management is proposing three tiers of MSC that will apply to all residential price plans based on the type of dwelling and the amperage level of the service:

- Tier 1: \$20 MSC is applicable to a single unit in a multiple family house, an apartment unit, a condominium unit, a townhouse or a patio home with a service entrance of 225 amps or less.
- Tier 2: \$30 MSC is applicable to a dwelling type not listed in Tier 1 with a service entrance of 225 amps or less.
- Tier 3: \$40 MSC is applicable to any residence with a service entrance of more than 225 amps.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

# Name: Jabe Sandberg

Record Number: b179a41d

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

1. What event has occured, which has triggered the need to "Update the electric grid"? 2. If the increase is approved, then after the grid has been "updated", will the rates go back down? Why not?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#b179a41d

#### Response:

Hi Jabe,

Thank you for submitting your question regarding SRP's pricing process.

SRP management is proposing price changes intended to account for rising costs, ensure that SRP maintains its long-term financial health, and reflect SRP's continued transition to sustainable resources and new technologies. The price proposal reflects, among other things, an increase in base prices to address expenses related to replacing aging infrastructure, adapting to an evolving power grid, and enhancing customer programs and services, while maintaining reliability and safety.

As part of a pricing proposal, SRP often raises overall prices in addition to structural changes such as new price plans. However, in 2019 the SRP Board of Directors voted to decrease overall bills by 2.2%.

Beyond the price increase, SRP management's proposal is to simplify the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two new time-of-use plans (E-16 and E-28) that will be available to customers with and without solar. Both proposed new plans include an 8 a.m. – 3 p.m. super off-peak period every day of the year, where energy costs are more than 50% lower than on the basic plan. Both include on-peak hours where energy is more expensive; one plan has on-peak hours weekdays from 6 p.m. – 9 p.m., and the other has on-peak hours weekdays 5 p.m. – 10 p.m. and an on-peak average demand charge. You may be able save money if you choose a time-of-use price plan and shift electricity usage away from the on-peak period and to the super off-peak period.

## Name: Taimur K Burki

**Record Number:** 75aa0f9a

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

**Comment:** 

Why no public forum in Tempe, where SRP HQ is? Also with the massive investment in solar which requires very little maintenance, which has reduced the need for more gas powered turbines, why is the cost increasing? What is the basis of this?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#75aa0f9a

#### Response:

Thank you for submitting your question regarding SRP's Pricing Process.

SRP will be conducting centrally located Open Houses in the east and west valley. The public board meetings will be held at SRP's Public Administration Building located in Tempe. For more information on Open Houses and public board meetings, visit:

https://www.srpnet.com/price-plans/electric-pricing-public-process/learn-about-the-public-pricing-process.

SRP management is proposing price changes intended to account for rising costs, ensure that SRP maintains its long-term financial health, and reflect SRP's continued transition to sustainable resources and new technologies. The price proposal reflects, among other things, an increase in base prices to address expenses related to replacing aging infrastructure, adapting to an evolving power grid, and enhancing customer programs and services, while maintaining reliability and safety.

## Name: Monica Tucker

Record Number: d3b5521f

**Delivery Method:** Digital Submission

**Received Date:** 12/4/2024

Comment:

I don't understand why there needs to be an increase. You offer customers solar energy, yet it is more expensive than what we currently pay. If you have the ability to offer solar, then I'm not sure why it is not offered at a cheaper price since you are using natural resources. From my eyes, you just want more money from customers instead of trying to help the planet and customers. If you were to put more customers on solar since you have the ability then you would save the planet and save customers money as well.

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#d3b5521f

Hi Monica,

Thank you for the comments.

SRP management is proposing price changes intended to account for rising costs, ensure that SRP maintains its long-term financial health, and reflect SRP's continued transition to sustainable resources and new technologies. The price proposal reflects, among other things, an increase in base prices to address expenses related to replacing aging infrastructure, adapting to an evolving power grid, and enhancing customer programs and services, while maintaining reliability and safety.

SRP sets prices based on our costs. Over the last decade, the grid has evolved and there is now a low-cost, low-carbon period during daylight hours when solar energy is abundant. SRP management is therefore proposing low-price daytime periods to encourage customer usage during these hours, thereby lowering emissions and costs.

Specifically, SRP management is proposing to simplify SRP's portfolio of Price Plans and bring the super off-peak concept that EV customers currently enjoy to the new residential and all commercial time-of-use Price Plans. Under the proposal, SRP's two residential time-of-use plans going forward (E-16 & E-28) would each include daily 8 a.m. -3 p.m. super off-peak prices that are more than 50% lower than basic price plans. The on-peak period would be weekdays from 6 -9 p.m. or 5-10 p.m., depending on the Price Plan. All proposed commercial and industrial Price Plans that include time-of-use hours would also have a low-price period from 8 a.m. -3 p.m.

Name: Patrick

**Record Number:** ac0079c6

**Delivery Method:** Digital Submission

**Received Date:** 12/5/2024

**Comment:** 

Why are you raising rates on customers with solar? There's no explanation. Why are you raising the fees on residential customers? This seems predatory. Why are you not providing any details about the proposed upgrades that you are charging us more money for?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#ac0079c6

#### Response:

Hi Patrick,

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

Your monthly service charge (MSC), which helps cover costs of customer service, billing, and your connection to the grid, is \$20.00 today (or perhaps \$32.44 or \$45.44 if you're a solar customer). This proposal includes a tiered MSC for all price plans:

- If you're in a multi-family home (apartment, condo, townhome), it stays at \$20.00
- If you're in a typical single-family home, it is \$30.00
- If you're in a home with a very large electric service entrance, it is \$40.00.
   About 3% of SRP residential customers fall into this category.

## Name: Mel Worters

Record Number: 0bdf2277

**Delivery Method:** Digital Submission

**Received Date:** 12/6/2024

**Comment:** 

While adding an up to 5.9% price increase may miniscule to SRP, to the many seniors who are also being hit by rate increases in services from city providers (such as Mesa's recent price hike), it is an unfair increase which creates additional financial hardships. Many individuals will be adversely affected. Lastly, penalizing individuals who have paid to install solar panels seems counter-intuitive. Wasn't "green energy" the goal? If so, why are those individuals to be charged a higher percentage increase?

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#0bdf2277

Hi Mel,

Thank you for reaching out.

Under SRP management's proposal, customers on solar price plans (E-13, E-14, E-15, and E-27) have a higher percent average increase because, relative to other residential customers, they pay a lower percentage of the costs incurred by SRP in providing those customers with electric service. Currently, customers on solar price plans do not pay the full amount of the fixed costs that SRP incurs to serve those customers; the unpaid costs are being borne by other customers.

The proposed changes bring the residential and residential solar classes closer together and provide more appropriate cost recovery consistent with SRP's Pricing Principles of Equity, Cost-Relation, and Gradualism.

In addition, included in SRP management's proposal are two new price plans that include an 8 a.m. – 3 p.m. super off-peak period every day of the year, where energy costs are more than 50% lower than on the basic plan. You may be able to save by choosing a time-of-use Price Plan and shifting electricity usage away from the on-peak period and into the super off-peak period.

Although SRP does not offer a specific discount for seniors, there are various options available to help customers save on their bill. One such option is the Economy Price Plan, which provides a discount for eligible customers with limited incomes. SRP management is proposing an expansion to, and increase of, the limited income discount, expected to make over 100,000 more customers eligible for a \$25 per month credit to their bills.

In addition, included in SRP management's proposal are two new price plans that include an 8 a.m. - 3 p.m. super off-peak period every day of the year, where energy costs are more than 50% lower than on the basic plan. You may be able to save by choosing a time-of-use Price Plan and shifting electricity usage away from the on-peak period and into the super off-peak period.

For more information about savings and our customer programs, including program eligibility and enrollment processes, please go on SRP's website and click Customer Service in the banner at the top, or call our Customer Service department: (602) 236-8888

## Name: Kathleen A. Nickolich

**Record Number:** d80f055c

**Delivery Method:** Digital Submission

**Received Date:** 12/6/2024

Comment:

This information tells me what your new fees will be but it doesn't say why it's needed or how, we the consumers, will benefit from it. What kind of salary increase and bonuses wil the executives receive from my increased monthly bill? Also, where does this leave the EV plan?

Response Subject: SRP Corporate Pricing Response to Public Comment

#d80f055c

Hi Kathleen,

Thank you for your questions regarding SRP's Pricing Process.

For more information on how your electric bill may change based on the proposed change in your price plan, please call our Customer Service department at (602) 236-8888. For more details on the pricing proposal, please visit <a href="Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle">Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle</a>.

In Fiscal Year 2024 (FY24), SRP executive compensation (including salaries & wages, bonuses, dependent tuition reimbursement, and deferred compensation/healthcare reimbursement), was approximately \$9.2M\*. Under SRP management's proposal, in Fiscal Year 2026 (FY26), SRP would collect approximately \$4,384.6M in revenues from customers. Therefore, executive compensation (based on FY24 figures) is approximately 0.21% of proposed revenues in FY26.

\*The SRP executive management team currently consists of the General Manager & Chief Executive Officer and nine Associate General Managers. Transition efforts associated with retirements in FY24 led to a temporary increase in the number of SRP executives; there are 14 executives included in this figure.

Management proposes freezing E-29 (Residential Electric Vehicle Price Plan) from new participation as of the November 2025 billing cycle. The frozen price plan will be eliminated no later than the November 2029 billing cycle and customers may choose another applicable price plan of their choice. If no choice is made by the time E-29 is eliminated, customers will be moved to E-28 (Price Plan for Residential Time-of-Day Service with Super Off-Peak Hours).

## **Name: Albert Prano**

**Record Number:** 9059542c

**Delivery Method:** Digital Submission

**Received Date:** 12/11/2024

Comment:

Please do not increase rates or fees again so soon. It's becoming more and more unaffordable for retirees on fixed incomes. Doesn't SRP get the revenue it needs from issuing bonds available to investors? "On September 5, 2024, The Arizona Corporation Commission (ACC) approved SRP's request to issue up to \$6.4 billion in tax-exempt revenue bonds to help finance new generation, transmission and distribution projects that are needed to support the growth of the Phoenix metropolitan area and help ensure reliable, affordable and sustainable power for SRP customers. The ACC also approved up to \$7 billion in revenue refunding bonds to refinance debt and lower borrowing costs for SRP, which helps keep costs down for customers."

**Response Subject:** SRP Corporate Pricing Response to Public Comment

#9059542c

Thank you for submitting your question regarding SRP's pricing process. In addition to optional pricing plans, which help customers manage their electricity bills, SRP offers a variety of <u>energy efficiency rebates and resources</u> to help customers customize their account, lower their energy use and save money on their bills.

SRP also offers a variety of bill assistance programs and resources that can be found at <a href="style="style-type: square;">srp.net/heretohelp.</a>. This proposal increases average residential bills by 3.5% (\$5.64 per month), though actual impacts will vary by price plan and usage.

In regards to your question on the recently approved ACC bond authority, SRP strives to fund our capital expenditures with a balancing act between funds from operations and borrowing activities. This balance works to spread the costs of long-lived assets between our current customers and future customers.

The recently approved ACC Authorization is in support of SRP's 6-year \$11.5B Capital Improvement Program. With this approved authorization, SRP has the ability to seek approval from our publicly elected Board annually for the issuance of debt to pay our annual capital expenditures. This recent authority works towards maintaining the balance between borrowing and pricing.

SRP does not have stockholders or pay dividends. SRP is a community-based, nonprofit utility. Revenues are reinvested back into our electric grid for the benefit of all customers. Due to this, as SRP updates our 6-Year Financial Plan annually, we forecast out our revenues at existing rates and our expenses. We then look at the cash shortfall, which in the most recent estimates was \$6B. We plan on using our balancing act to make up that \$6B shortfall with about 83% from borrowing and 17% from pricing actions.