

# SRP Price Process Comments Week ending January 18, 2025

# SRP Public Price Process

## Comments from: 1/12/2025

**Name: Valaree Weiss**

**Record Number:** b2dfaaef

**Delivery Method:** Digital Submission

**Comment:**

Does new construction aka new business buildings, homes and apartments pay a surcharge or fee or do existing customers pay across the board to add new construction to the existing power grid?

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**Name: ROBERT D. ST. LOUIS**

**Record Number:** 687c4496

**Delivery Method:** Digital Submission

**Comment:**

The Demand Charge is very hard to understand. I would much rather pay a higher price per kilowatt hour during the on-peak time and not have to worry about the demand charge. It is very difficult to track or understand, and seems unnecessary.

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**Name: Antonio Lanoix**

**Record Number:** 0426113b

**Delivery Method:** Digital Submission

**Comment:**

At a time where most families are struggling to maintain basic life necessities, SRP should be exploring how THEY can reduce costs to customers. A price increase during this recession is in poor taste and an insult to Arizona citizens. I strongly object to this.

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# SRP Public Price Process

## Comments from: 1/13/2025

**Name: Lisa P Huntley**

**Record Number:** 03c6b5c6

**Delivery Method:** Digital Submission

**Comment:**

Prices are already outrageous for most families to afford. Please DO NOT raise our prices in order to increase your profits. You are providing public service to the community, not to make your board and officers richer. Thank your for allowing the common folk to have some input in your decision making. Sincerely, Lisa Huntley, David Schranz and family.

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**Name: Mark Wilson**

**Record Number:** 5ae8df6f

**Delivery Method:** Digital Submission

**Comment:**

There is no logical reason why you would not increase the buy back credit for those homes (with solar) that are able to put power on the grid during peak usage.

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**Name: Pearl Monzalvo**

**Record Number:** c57d53cb

**Delivery Method:** Digital Submission

**Comment:**

I disagree as would anyone else in mesa with a rate of increase change . I chose to live in mesa for the affordability and control. Unlike APS where you live in constant fear of being in the dark and struggling to survive to keep your power on for your family. Constant anxiety about bills so high that you don't know what to do. I choose SRP because they seemed to have family in mind. If this rate of increase is placed in affect so many more families will struggle. The change might not allow myself and other families or individuals who are making ends meet to comfortably have their finances in order. Please keep us the costumers in mind.

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## **Name: Benjamin Owens**

**Record Number:** ad093945

**Delivery Method:** Digital Submission

**Comment:**

I would like to express my frustration regarding the inability to make payments online after two returned payments. These payments were only returned because it took over three days for you to process them after I submitted them. By that time, the funds were no longer available. This has created a significant inconvenience, as I now have to take cash to a store to make payments, which is both time-consuming and unnecessary. Additionally, I was charged \$18 in fees by SRP, along with \$34 twice by my bank due to the delayed processing. This feels unfair, as the situation was caused by your delay, not by negligence on my part. I kindly ask that you review your payment processing policies and consider adjusting fees in situations like this. I hope this feedback helps improve the system for everyone. Thank you for your time.

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# Name: Jeffrey D. Gilbert

**Record Number:** 5de2ad95

**Delivery Method:** Digital Submission

## Comment:

I believe this message should be directed to the office of the SRP Corporate Secretary. I would appreciate acknowledgement of the requests made below. There are three topic areas noted below. Two have specific document and discussion requests. I hope to be prepared for discussion of the third topic later this week. (Note that I refer to the "Proposed Adjustments to SPR's Standard Electric Price Plans Effective with the November 2025 Billing Cycle" as the "Proposal.") (1) The projected growth rate as set forth in the "Current Environment" section of the Proposal and, in particular, "Figure 2. Retail Sales Growth" seem unusual. The graph suggests that, after decades of relatively modest growth, FY25 will be an inflection point that more-or-less quadruples the historical growth rate. FY32, then, appears to show the growth rate moderating to the historical baseline. The accompanying text is phrased in passive terms (for example, "increasingly seeing", "is expected", "the ... forecast ... shows") I request supporting documentation and an opportunity to speak with the relevant party(ies) at SPR with regard to: \* Who produced this forecast, what data was used, and does the forecaster have any historical record of accurate forecasts? \* What would change in the Proposal if it used a projected growth rate of, say, 2x the historical rate that than 4x? \* Is there any risk SPR's grid stability or financial stability if the possible over-investment in supporting this growth rate occurs yet the growth rate falls materially short of the projection? (2) The "Carbon Emissions Reductions" "pillar" of the 2035 Sustainability Goals. There is no cost-benefit analysis associated with this "pillar" - no specifics or measurables concerning the steps planned beyond aspirational remarks. Unless the cost to SPR customers is negligible, there are at least four questions that need to be addressed. I request supporting documentation and an opportunity to speak with the relevant party(ies) at SPR with regard to: \* Why is this one of the "sustainability goals?" Absent any cost-benefit analysis, this objective should not be imposed on rate payers. \* The foundation of "Net Zero" is not science - there is effectively no basis for the so-called anthropomorphic climate change assertion. Details concerning faults in what constitutes the IPCC modeling process are too long to include here. \* Any reduction in CO2 emission by SPR is meaningless with the enormous coal-fired generation coming on-line in the PRC and India \* Apart from financial considerations, "net zero" "renewable" generation environmental costs (land area, hazardous material and waste) reviewed in terms of the supposed benefits. (3) What is the rationale to associate all residential "customer generation" with "Time of Use" plans? SRP pricing plans discourage modest roof-top solar generation. The basis for pushing residential customers into the complicated and potentially cost-prohibitive ToU pricing plans is not clear to me. I have not had an opportunity to study the "Cost Allocation Study" document in detail but I hope to have time to review that document during the period the Board is considering the Proposal. Thank you.

## **Name: Eileen**

**Record Number:** e638d7cf

**Delivery Method:** Digital Submission

**Comment:**

I think it is outrageous that you charge me \$20 a month to send someone to read my meter every other month. That's \$40 I pay for the meter reader to come one time. It doesn't take any skill to go and read a meter and if you schedule customers in the same area at the same time, it shouldn't be a big expense for SRP. What you're charging is EXCESSIVE. An unskilled entry level employee can read the meters for minimum wage.

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## **Name: David Vernon**

**Record Number:** de8f4663

**Delivery Method:** Digital Submission

**Comment:**

On the proposed changes to SRP price plans, page 60 shows per kW pricing of \$22.31 per kW (summer), \$25.15 per kW (summer peak), and \$10.73 per kW (winter) for the E-16. On page 65, the price plan shows \$11.71 per kW (summer), \$16.20 per kW (summer peak), and \$7.73 per kW (winter). Are the per kW numbers for the proposed E-16 demand charges correct on page 60, or on page 65? Is there a reason there are 2 different sets of demand charge numbers for the same rate plan on these 2 different pages of the proposal?

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## **Name: David Bender**

**Record Number:** MI6924594

**Delivery Method:** Other

**Attachments:** RE\_ Supplemental Request for Earth Justice DR.pdf

*\*To receive a copy of Attachments please  
contact the Corporate Secretary's Office and Reference*

**Comment:** *Record #MI6924594*

A response request for additional information on EJ01, from 12/11.

Question #3 Please produce all calculations of your hourly system lambda conducted within the last three years.

**Please note: SRP Management will be responding to this request separately.**

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# SRP Public Price Process Comments from: 1/14/2025

**Name: Allison George**

**Record Number:** MI6925887

**Delivery Method:** Email to Corporate Secretary

**Attachments:** Questions for SRP Management FINAL\_WRA.pdf

*\*To receive a copy of Attachments please  
contact the Corporate Secretary's Office and Reference  
Record #MI6925887*

**Comment:**

2025 Pricing Process Questions for SRP Management

- 1-1. How many "Carbon Reduction Programs" does SRP anticipate it will introduce under its proposed Carbon Reduction Rider?
- 1-2. What Carbon Reduction Programs does SRP potentially see as being available in the future under the Carbon Reduction Rider?
  - a. Please provide a short description of each potential future Carbon Reduction Program.
- 1-3. When a customer chooses a level of participation in SRP's new Carbon Reduction Rider, will the Rider also allow customers a choice of which Carbon Reduction Programs their premium will go towards?
- 1-4. What does SRP define as a Carbon Credit per the Carbon Reduction Rider?
- 1-5. Which quality control measures does SRP intend to use to inform its purchase of Carbon Credits?
- 1-6. Is a "renewable energy certificate," as used throughout SRP's price proposal the same as the a "renewable energy credits" as defined in A.A.C. R14-2-1803?
- 1-7. SRP states that it plans to broaden the Energy Attribute Certificate Rider to include other energy attribute certificates, such as Zero Emission Credits ("ZECs"). What is the full list of energy attribute certificates that SRP believes it may use for this rider?
- 1-8. The proposed adjustments state that residential load growth is expected to grow almost 8% from fiscal year 2025 to fiscal year 2030, while commercial and large industrial growth is forecasted to grow more than 50% over that period. What protections are in place to prevent cost shifting onto residential

ratepayers?

1-9. According to the proposed adjustments, new hardware designs have been implemented for SRP's combined-cycle fleet, "which enables the units to generate power more efficiently, operate at lower minimum loads while maintaining emission requirements, and operate longer before needing to replace the hardware." How do these upgrades impact forecasts for dispatch, capacity factor, and cumulative annual emissions?

1-10. The proposed adjustments list a number of initiatives for controlling costs. Fuel and the variable nature of fuel costs subject customers to significant risk. Similarly, Navajo Generating Station was closed due to the unfavorable economics of coal plant operation. Please describe cost controlling efforts to reduce fuel price risk for customers associated with both coal and fossil gas generation.

1-11. Why is there a cap (\$300,000) on energy efficiency charge through the System Benefits Charge?

1-12. Customers currently using the E-21 and E-22 ("EZ-3") plans will eventually be moved to the E-23 basic price plan, rather than another time-of-use ("TOU") rate. Please provide justification for the decision to move customers out of a TOU rate and into a non-TOU rate, rather than moving them into one of the active TOU rates.

1-13. What method is used for selecting peak, off-peak, and super off-peak periods for individual tariffs?

1-14. Why are there hours when some tariffs have peak pricing, while other tariffs have super off-peak pricing during the same hours?

1-15. Both residential and non-residential plans have three tiers of energy charges, depending on the hours in which they consume electricity. For residential plans these are on-peak, off-peak, and super off-peak. For non-residential plans these are on-peak, shoulder-peak, and off-peak. Why is there a difference in naming conventions for residential vs. non-residential tariffs?

1-16. Why is there a limit (205 MW) on the total interruptible load served under the Customized Interruptible Rider?

1-17. Please provide a breakdown of any transmission-related investments included in the future test year.

1-18. Please provide a summary of feedback received from customers who participated in the E-28 pilot.

We appreciate the opportunity to provide these questions.

Alex Routhier, Ph.D.

Arizona Clean Energy Manager/Senior Policy Advisor

Western Resource Advocates

Emily Doerfler, Esq.

Arizona Clean Energy Attorney

Western Resource Advocates

# Name: Patrick Woolsey

**Record Number:** MI6926262

**Delivery Method:** Email to Corporate Secretary

**Attachments:** Sierra Club 1st Set of Data Requests to SRP  
1.13.2025.pdf

*\*To receive a copy of Attachments please  
contact the Corporate Secretary's Office and Reference  
Record #MI6926262*

## Comment:

Sierra Club's First Set of Data Requests to Salt River Project Agricultural Improvement and Power District regarding SRP's 2025 Pricing Proceeding

Date Requested: January 13, 2025

Requested from: Salt River Project Agricultural Improvement and Power District (SRP)

Requested by: Sierra Club

Requester Contact: Patrick Woolsey, patrick.woolsey@sierraclub.org, (415) 977-5757

Requested Response Date: January 24, 2025

Sierra Club respectfully requests that SRP respond to the following data requests on a rolling basis as information becomes available, and no later than January 24, 2025, as the requested data may inform Sierra Club's potential presentation to the SRP board on January 31, 2025. If any of SRP's responses to any of the following questions contain confidential information, please provide a nondisclosure agreement for Sierra Club's signature so that Sierra Club may access that confidential information.

1. Please provide copies of SRP's responses to all written information requests received from other stakeholder organizations or law firms, including AriSEIA, Vote Solar, SWEET, Earthjustice, Tierra Strategies, and Rose Law Group, related to SRP's pricing proceeding. Please provide these responses on an ongoing basis as they become available.
2. Please provide copies of the transcript and video recording of the stakeholder interviews of SRP management and consultants conducted on January 16, 2025 as soon as that transcript and recording become available.

3. Please refer to the Proposed Adjustments to SRP's Standard Electric Price Plans ("Proposal"), page 13. Here, SRP states that it made approximately \$2 billion in capital investments in generation resources from May 2019 through April 2024. a. What percentage of that \$2 billion total was invested in gas-fired generating resources during that 5-year period?  
b. What is the total amount (in dollars) of SRP's capital investment in gas-fired generating resources from May 2019 through April 2024?  
c. What percentage of that \$2 billion total was invested in coal-fired generating resources during that 5-year period?  
d. What is the total amount (in dollars) of SRP's capital investment in coal-fired generating resources from May 2019 through April 2024?
4. Please refer to the Proposal, page 18. Here, discussing generation maintenance and improvements, SRP states that from May 2019 to April 2024, SRP spent approximately \$660 million on power plant betterments, driven largely by work at Palo Verde Generating Station (approximately \$181 million) and Gila River Generating Station (approximately \$125 million).  
a. Please describe the \$125 million in spending at Gila River Generating Station during that period.  
b. Of the \$660 million spent on power plant betterments from May 2019 through April 2024, how much of that total was spent on gas-fired generating resources?  
c. Of the \$660 million spent on power plant betterments from May 2019 through April 2024, how much of that total was spent on coal-fired generating resources?
5. Please refer to the Proposal, page 19. Here, SRP states that the project to "split" the selective catalytic reduction (SCR) system to accommodate both Coronado Generating Station units will cost approximately \$78 million and is expected to be in service by February 2025.  
a. Is SRP seeking to recover that \$78 million cost from customers via this pricing proceeding, in whole or in part?  
b. If so, how much of that \$78 million cost is SRP seeking to recover from customers via this proceeding?
6. Please refer to the Proposal, page 19. SRP states that the Coronado "split" SCR project and its operational strategy for Coronado "will reliably and economically meet customer load growth while allowing SRP to meet its 2035 Sustainability Goals to reduce CO2 emissions" and that "[t]his approach will result in less CO2 emissions than if CGS Unit 1 were retired in 2025, while maintaining critical capacity to serve SRP customer needs during the highest demand seasons."  
a. Has SRP performed any analysis demonstrating that the Coronado split SCR upgrade will provide reliable and economic supply for customer load growth? If so, please provide that analysis.

b. Did SRP perform any analysis of alternatives to the Coronado split SCR project, including analysis of other resources that could replace Coronado and their CO2

emissions relative to Coronado emissions? If so, please provide that analysis.

7. Please refer to the Proposal, page 22. Here, SRP states that its annual generation maintenance expenses have increased nearly \$30 million since Fiscal Year 2020 Test

Year through Fiscal Year 2026 Test Year, which SRP states is primarily attributable to increases for maintenance at Palo Verde Generating Station and a “major overhaul” at Mesquite Generating Station.

a. Please describe the “major overhaul at Mesquite Generating Station planned for Fiscal Year 2026.”

b. From Fiscal Year 2020 Test Year through Fiscal Year 2026 Test Year, has there been an increase in generation maintenance expenses at coal-fired power plants

wholly or partly owned by SRP? If so, what is the dollar amount of SRP’s share of those generation maintenance expenses?

c. During that period, has there been an increase in generation maintenance expenses at SRP’s gas-fired power plants besides Mesquite Generating Station? If so, what

is the dollar amount of that increase?

d. Please provide SRP’s annual generation maintenance expenses in Fiscal Year 2020 Test Year and in Fiscal Year 2026 Test Year at (i) its coal-fired generating facilities and (ii) its gas-fired generating facilities.

8. Please refer to the Proposal, page 31, Table 1.

a. Of the targeted annual 3.4% revenue adjustment for residential customers, (i) what percentage of that increase is attributable to SRP’s spending on coal-fired generating resources, and (ii) what percentage of that increase is attributable to SRP’s spending on gas-fired generating resources?

b. Of the targeted annual 5.9% revenue adjustment for residential customers, (i) what percentage of that increase is attributable to SRP’s spending on coal-fired generating resources, and (ii) what percentage of that increase is attributable to SRP’s spending on gas-fired generating resources?

c. Of the targeted annual 2.4% revenue adjustment for all customer classes, (i) what percentage of that increase is attributable to SRP’s spending on coal-fired generating resources, and (ii) what percentage of that increase is attributable to SRP’s spending on gas-fired generating resources?

9. Please refer to the Proposal, page 15. SRP states that for the Copper Crossing project and Coolidge Expansion Project, it is using a new vendor to achieve savings relative to quotes

from previous vendors. Why wasn’t the lowest-cost vendor used for the Desert Basin and Agua Fria expansion projects?

10. Please refer to the document titled “Derivation of Proposed Changes to SRP’s Transmission and Ancillary Services Prices,” pages 31-32, Table 3.

The portions of Table 3 on these pages provide revenue requirement data for Fiscal Year 2024 for SRP's coal and gas-fired resources.

a. Please provide equivalent data for Fiscal Years 2022 and 2023 for Coronado, Four Corners, Springerville, Craig and Hayden.

b. Please provide equivalent data for Fiscal Years 2022 and 2023 for Agua Fria, Desert Basin, Gila, Kyrene, Mesquite, Santan, and Coolidge.

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**Name: Steve Neil**

**Record Number:** MI6927828

**Delivery Method:** Email to Corporate Secretary

**Attachments:** 20250113\_Neil\_Request.pdf

**Comment:** *\*To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #MI6927828*

**I'd like to receive the "LOLP Results Study" and "Marginal Cost Study" Tuesday, Jan. 14, to make this line of questioning quicker. I can pick up the printed versions Tuesday also.**

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**Name: L Duane Johnson**

**Record Number:** 8071076c

**Delivery Method:** Digital Submission

**Comment:**

The new Trump administration coming in 20 Jan 2025 is promising a large reduction of the inflation in the United States caused by the Obama and Biden Administrations . Please hold off raising SRP electric rates for another year and see if the SRP operating costs do not go down and thus make an increase in residential and commercial electrical rates unnecessary. The present SRP electrical rates and programs are very reasonable and I do not want to see any increase if not necessary. IF the Board decides to increase our rates and then inflation decreases to the 2017 - 2021 levels. Would the Board then institute hearings to decrease SRP electric rates and programs??

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# SRP Public Price Process

## Comments from: 1/15/2025

**Name:** matthew bell

**Record Number:** b0fd34e5

**Delivery Method:** Digital Submission

**Comment:**

Current Utility Prices across the board (Internet, Water, Power) no matter who the supplier is are outrageously expensive and all these rate increases (water was 25% last year) is budget killers. It doesnt take the cost you charge to produce and distribute energy. I honestly believe the state needs to be involved and All utilities should be based on the minimum wage rate of the state. It is completely unfair to all the states population for these constant rate increases and profitability of utilities based on basic needs. I vote NO on the rate increase.

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# SRP Public Price Process

## Comments from: 1/16/2025

### **Name: Kathleen Gahinet**

**Record Number:** 56b490d7

**Delivery Method:** Digital Submission

**Comment:**

During these inflationary times when people on a fixed income are struggling to buy groceries, it is IMPERATIVE that electricity providers like SRP strive to control their costs so as not to overly burden the public whom has NO CHOICE about whether or not to use electricity when temperatures reach 115 degrees in the summer: this is a matter of life and death!

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### **Name: Patricia Duff**

**Record Number:** b6ea82a7

**Delivery Method:** Digital Submission

**Comment:**

How about LOWERING PRICES for EVERYONE. STOP BUILDING new apartments or condos. What's happening with the budget plan? I pay a set amount every month. We're in a small house with 2 people... 1087sf, 1 bathroom. Do not become like APS! President Trump will make you bring the rates down anyway.

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# **Name: Autumn Johnson**

**Record Number:** MI6932185

**Delivery Method:** Email to Corporate Secretary

**Attachments:** AriSEIA 1st DR to SRP 1.16.2025.pdf; RE\_Price Proceeding.pdf

*\*To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #MI6932185*

## **Comment:**

**ARIZONA SOLAR ENERGY INDUSTRIES ASSOCIATION (ARISEIA)  
FIRST SET OF DATA REQUESTS TO  
SALT RIVER PROJECT (SRP)  
JANUARY 16, 2025  
PROPOSED ADJUSTMENTS TO SRP'S STANDARD ELECTRIC PRICE  
PLANS EFFECTIVE WITH THE NOVEMBER 2025 BILLING CYCLE  
(AMENDED AND RESTATED)**

## **GENERAL INSTRUCTIONS**

1. All information is to be divulged that is in your possession, custody or control, or the possession, custody, or control of your attorneys, investigators, agents, employees, or other representatives, or which you may discover through reasonable inquiry.
2. If you cannot answer a Data Request in full and have exercised thorough diligence in an attempt to secure the information requested, then you must so state. You must also explain to the fullest extent possible the specific facts concerning your inability to answer the Data Request and supply whatever information or knowledge you have concerning any unanswered portion of the Data Request.
3. If your answer to any Data Request is "unknown," "not applicable," or any other similar phrase or answer, state the following:
  - a. Why the answer to that Data Request is "unknown" or "not applicable";
  - b. The efforts made to obtain answers to the particular Data Request; and
  - c. The name and address of any person who may know the answer.
4. Where a Data Request requires you to state facts you believe support a particular allegation, contention, conclusion, or statement, set forth with particularity:
  - a. All facts relied upon;

b. The identity of all lay and expert witnesses who will or may be called to testify with respect to those facts.

5. If you contend that the answer to any Data Request is privileged, in whole or in part, or if you object to any Data Request, in whole or in part, state the reasons for such objection and identify each person having knowledge of the factual basis, if any, on which the privilege is asserted.

6. Where an individual Data Request calls for an answer that involves more than one part, each part of the answer should be clearly set out so that it is understandable.

7. These Data Requests are intended as continuing Data Requests which require that you supplement your answers setting forth any information within the scope of the Data Requests as may be acquired by you, your agents, attorneys, or other representatives following the service of your original answer.

## DEFINITIONS

As used in these Data Requests the following terms have the meanings set forth below:

1. "You" or "your" refer to and are meant to include, International Brotherhood of Electrical Workers ("SRP") and all of its agents, attorneys, investigators, employees, representatives, officers, directors, managers, members, subsidiaries, and parent companies, and separate answers should be given for each.

2. "Document" refers to any physical or electronic thing containing information or from which information can be discerned including, without limitation, any affidavit, agreement, appraisal, audio tape, bank trust, book, bid, book of account, cd-rom, check, computer disk, contract, correspondence (sent or received), declaration of trust, deed, deposition, diagram, diary, drawing, e-mail, instrument, invoice, lease, ledger, memorandum, memorandum of lease, note, notes of conversation (typed or written), outline, paper pamphlet, partnership agreement, photograph, receipt, recording (whether or not transcribed), report, statement, study, text message, transcript, trust instrument, visual depiction, voicemail, voucher, and any other such physical objects and things and any data compilation(s) from which information can be obtained, translated through dictation devices into reasonably usable form when translation is practicably necessary. "Document" or "Documents" further include any and all "original" or "duplicate" "writings," "recordings" or "photographs" (as those italicized terms are defined in Rule 1001 of the Arizona Rules of Evidence<sup>1</sup>), whether stored electronically or in traditional paper files and including (but not limited to) all "writings" and "recordings" memorializing or constituting any communications, data, files or information stored on any computer, computer software, computer programs, computer system, or electronic media, of every kind and description, however produced

or reproduced, WHETHER DRAFT OR FINAL, including (but not limited to) all communications, documentation, letters, correspondence, e-mail, Internet Web Pages, memoranda, notes, films, transcripts, contracts, agreements, licenses, memoranda or notes of telephone conversations or personal conversations, telephone messages, microfilm, telegrams, books, newspaper articles, magazines, advertisements, marketing materials, periodicals, bulletins, circulars, pamphlets, statements, notices, reports, rules, regulations, directives, teletype messages, minutes of meetings, lists of persons in attendance, interoffice communications, reports, summaries, financial statements, ledgers, books of account, proposals, prospectuses, schedules, organization charts, offers, orders, receipts, working papers, calendars, appointment books, diaries, time sheets, logs, movies, tapes for visual or audio reproduction, recordings, or materials similar to any of the foregoing, however denominated, and including writings, drawings, graphs, charts, photographs, data processing results, printouts and computations (both in existence and stored in memory components), and other compilations from which information can be obtained or translated, if necessary, through detection devices into reasonably usable form. THE TERM "DOCUMENT" INCLUDES ALL DUPLICATES OF A DOCUMENT WHICH CONTAIN ANY ADDITIONAL HANDWRITING, UNDERLINING, NOTES, DELETIONS, OR ANY OTHER MARKINGS, MARGINALIA OR NOTATIONS, OR ARE OTHERWISE NOT IDENTICAL COPIES OF THE ORIGINAL.

3. "Possession" and "custody" include the joint or several possession, custody, or control of the above named or its agents, attorneys, employees, officers, directors, managers, members, subsidiaries, parent companies, and representatives.

4. "And" and "Or" and any other conjunctions or disjunctions used herein shall be read both conjunctively and disjunctively so as to require the provision of all information responsive to all or any part of each particular Data Request in which any conjunction or disjunction appears.

5. "Any," "Each" and "All" shall be read to be all inclusive.

6. "Relating to" or "Related to" means referring to, relating to, responding to, concerning, connected with, commenting on, in respect of, about, regarding, discussing, showing, demonstrating, memorializing, describing, mentioning, reflecting, analyzing, comprising, supporting, sustaining, constituting, evidencing, and pertaining to, whether in whole or in part.

#### DATA REQUEST

1.1 Please provide all data requests, responses, and attachments provided to other "interviewers" within this proceeding.

2.1 Please provide all work papers with formulas intact that were utilized in the development of your proposal and cost allocation study (CAS).

- 3.1 Please refer to page 14 of your proposal, why does self-developing solar projects cost less?
- 3.1.1. Why so much less when the bids are participating in an all source request for proposal (ASRFP)?
- 3.1.2. Why are self builds able to come online faster?
- 4.1 Please refer to page 15 of your proposal, does SRP intend to continue obtaining certificate of environmental compatibility (CECs) for any new gas projects?
- 5.1 Please refer to page 19 of your proposal, when does SRP plan to retire Springerville?
- 6.1 Please provide your expected load growth in the test year by customer class. What percentage of that growth is from data centers?
- 7.1 Despite significant load growth in the commercial and industrial space, SRP just changed master meter requirements that require multi-family housing units to have hundreds of interconnects per project, which will drive up costs and reduce the likelihood that all of the housing necessary to accommodate this growth to have any on-site generation. Is this going to be corrected? When?
- 8.1 Your proposed changes seem to indicate that solar + storage is preferable to standalone solar, but not enough to actually make the addition of a battery advantageous, so the result will likely be less distributed generation (DG) overall. Is that the intent? If not, please explain.
- 9.1 Which new rate is the default rate for new customers? What is the current default rate for new customers?
- 9.1.1. Is a time of use (TOU) rate the default? Should it not be, given the load growth expected?
- 10.1 Why are any customers going to get bumped to E-16 on or before November 2029? As opposed to working with them to select the correct plan?
- 11.1 Why would you move TOU customers (E-21 and E-22) to a non-TOU plan (E-23)?
- 12.1 How does the demand charge on E-16 work now versus current demand charges on the older plans?
- 13.1 Please refer to page 45 of your proposal, why are 64% of your residential customers not on a TOU plan? Does that make sense given the grid and all the load growth you predict?
- 14.1 Why are the on peak v off peak differentials not greater for all new plans? Why are they not closer to 3:1?
- 15.1 Is it correct that the on and off peak rates are different at different times of the year? Why? Is that confusing to customers? How does SRP know?
- 16.1 Please refer to your E-32 proposal: Why was the TOU period changed?
- 17.1 For commercial rates, the pricing differentials are not sufficient to justify storage, so the net effect is that solar investments appear to be marginally worse than before the rate design change. Energy storage will not pencil. Was that the intent?
- 18.1 Please refer to your E-36 proposal: Why do you continue to use a

declining block rate design? Why would you want prices to get cheaper the more you use, if we are seeing major increases in demand?

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1 Rule 1001 provides, in pertinent part:

“Rule 1001. Definitions. For purposes of this article the following definitions are applicable:

(1) Writings and recordings. “Writings” and “recordings” consist of letters, words, or numbers, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographing, magnetic impulse, mechanical or electronic recording, or other form of data compilation.”

(2) Photographs. “Photographs” include still photographs, x-ray films, video tapes, and motion pictures.

(3) Original. An “original” of a writing or recording is the writing or recording itself or any counterpart intended to have the same effect by a person executing or issuing it. An “original” of a photograph includes the negative or any print therefrom. If data are stored in a computer or similar device, any printout or other output readable by sight, shown to reflect the data accurately, is an “original”.

(4) Duplicate. A “duplicate” is a counterpart produced by the same impression as the original, or from the same matrix, or by means of photography, including enlargements and miniatures, or by mechanical or electronic re-recording, or by chemical reproduction, or by other equivalent technique which accurately reproduces the original.”

\*SEE LETTER ATTACHMENT

# SRP Public Price Process

## Comments from: 1/17/2025

**Name: Steven Neil**

**Record Number:** a87b3f6e

**Delivery Method:** Digital Submission

**Comment:**

I request the greater or more inclusive of the following two: 1) All the information SRP provided to Christensen Associates, the consultant to the Board of Directors. This includes emails, of course. 2) All the electronic versions of spreadsheets or other file formats which were used in creating any and all pricing presented in the Management's Complete Proposal document and, of course, any inputs it describes. If number 2 is going to take longer than number 1, please provide number 1 now, even a first phase without the emails, and we can talk about the differences between number 1 and number 2. There should be no redaction or alteration between what was provided to the consultant or what was used in preparing the proposal. If the original files contained automated links or references to other files, the links must be in working order in the all of the set of files provided. Errors should be displayed in any cell of any spreadsheet, for example. For textual references, the expectation is that they will name the exact document and the location within the document. I note that the above is the kind of information that other utilities provide in the routine course of their rate increase request and interested parties do not have to make a special request other than to maybe request access to the online store of such. If you send any more files to me or to others I collaborate with that are an incomplete set, that have inoperative links, that have missing data, or the like, this will be considered to be unresponsive and may result in seeking relief.

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## **Name: Austin Sloan**

**Record Number:** 558b3f4f

**Delivery Method:** Digital Submission

**Comment:**

Arizona Statues regulates the cost of services: Utilities [REDACTED]  
2107: Regulates utility fees, including gas, water, and electricity. Landlords can charge separately for these services by installing a submetering system or using a ratio utility billing system. Public utilities ARS Title 40: Regulates the time for furnishing services by public utilities, such as railroads, telephones, and telegraph companies. It also regulates the uniformity of demurrage charges. In acknowledgement of these statues, why are 4+ electric districts established by the county and being powered by SRP not regulated by the ACC (Arizona Corporation Commission) when The ACC regulates electric power companies, including Arizona Public Service (APS) and Tucson Electric Power? For the 5th largest metropolitan city in the US with over 3 million people in it this furthermore begs the question as to why a private company with a private board is internally deciding the pricing structure without consumer protection of ACC review + regulation?

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## **Name: Steven Neil**

**Record Number:** de4ee856

**Delivery Method:** Digital Submission

**Comment:**

SRP stated yesterday that the DG Exported kWh Credit put in place in 2019 is based on utility scale solar purchase power agreements. And that for this pricing process, it wishes to switch to a market-based price such as CAISO ELAP. Since the information made available in this pricing process does not give detail on either of these pricing methods and the actual prices, I request a summary (or more detail if you prefer). -per year from fiscal year 2019 to 2025 (or the closest calendar year if that is easier for you) -whether the energy came from solar or storage -total \$ paid or incurred the obligation to pay -how many MWh were purchased -the \$ per MWh average, as a quality check on the above two values -any other information you would like to add to improve understanding of the information. I have previously made a request for information about the CAISO ELAP data.

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# SRP Public Price Process

## Comments from: 1/18/2025

**Name: Joan Grussing**

**Record Number:** 79c8a007

**Delivery Method:** Digital Submission

**Comment:**

Please do NOT raise prices. We pay enough. i already pay enough. I vote NO to price increases.

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