

SRP Price Process Comments with Responses  
Received Week ending January 18, 2025

# SRP Public Price Process Responses from: 1/13/2025

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## **Name: Brandon Schmoll**

**Record Number:** 145a967e  
**Delivery Method:** Digital Submission  
**Received Date:** 12/2/2024

### **Comment:**

As an SRP customer do I get access the country club like facilities SRP has built in northern Tempe, or are these facilities limited to employees only?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #145a967e

### **Response:**

Brandon,

It sounds like you're asking about the PERA Valley Training and Conference Center. The facility was originally constructed in 1953 by SRP volunteers. The property provides meeting, training and conference, and recreational space for SRP employees. The facility allows SRP to consolidate critical training operations at one central location and can accommodate apprenticeship training, crane operator licensing, and heavy equipment certification, as well as safety skills and regulatory compliance training. In addition to supporting SRP employee and customer events, the PERA Valley Training and Conference Center is an important resource to many nonprofit organizations who utilize the facility for their meetings and community events.

Thank you for your inquiry.

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## Name: Daniel Gregg

**Record Number:** b4e0c3c4  
**Delivery Method:** Digital Submission  
**Received Date:** 12/2/2024

**Comment:**

Hello, I have a few questions: 1) If your revenues exceed costs by \$400 million then can we please lower or adjust rates? 2) I have had a \$20 service charge each month since I have had SRP in 2017. When I call and ask about the charge, the representative says it's an account management charge. Can you adjust the cost of electricity to incorporate this or change what the bill says it is? I have never been late on payments and this is the only utility that charges something like this. Some months, the service charge doubles my electricity bill. 3) (not a question) I do think SRP is one of the better and more transparent utilities. I've never experienced a black or brown out outside of natural causes or storms. I do like that you guys give back to the community and maintain your facilities. 4) I think this is a good forum to help customers. I live in a community where most are retired and on fixed incomes. This is an opportunity to hear their concerns.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#b4e0c3c4

**Response:**

Hello Daniel,

Thank you for your interest in SRP's Pricing Process and for your inquiries and comments.

Addressing them in order:

***1) If your revenues exceed costs by \$400 million then can we please lower or adjust rates?***

As a community-based, not-for-profit utility, SRP aims to have revenues match costs. SRP doesn't have stockholders or pay dividends. Revenues above and beyond costs are invested back into our electric grid for the benefit of all customers. As part of a public pricing process, we evaluate costs and revenue forecasts and if we were to see revenues far exceeding costs over the long-term, SRP management would likely propose price reductions to the Board. This is not an environment we're in, however, as Management is proposing increasing prices to account for rising costs, to ensure SRP maintains financial health, and to reflect SRP's continued transition to sustainable resources and new technologies.

**2) I have had a \$20 service charge each month since I have had SRP in 2017. When I call and ask about the charge, the representative says it's an account management charge. Can you adjust the cost of electricity to incorporate this or change what the bill says it is? I have never been late on payments and this is the only utility that charges something like this. Some months, the service charge doubles my electricity bill.**

The Monthly Service Charge (MSC) for residential customers has been part of customer bills for decades and 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.

**3) (not a question) I do think SRP is one of the better and more transparent utilities. I've never experienced a black or brown out outside of natural causes or storms. I do like that you guys give back to the community and maintain your facilities.**

Thank you! We work hard to serve our customers and community.

**4) I think this is a good forum to help customers. I live in a community where most are retired and on fixed incomes. This is an opportunity to hear their concerns.**

We sincerely appreciate your questions and feedback and hope this email is responsive to your inquiries.

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**Name: Julie Freemole**

**Record Number:** f1730b89  
**Delivery Method:** Digital Submission  
**Received Date:** 12/4/2024

**Comment:**

My husband (Brad Freemole) and I have been long-time SRP customers - Acct# [REDACTED]. We were stunned to receive the recent notification regarding the proposed residential price plan increases. Not surprised by the fact that prices need to increase. The part that makes no sense at all is the part indicating that the average increase for residents with solar is being proposed as substantially higher (5.9%) than customers without solar (3.4%). Can someone please explain the logic behind this thinking and why folks like us, who do have solar are being penalized for doing the right thing? Even SRP has a solar program that you encourage folks to sign up for and brag about on your website: "our commitment to cut carbon emissions by 82% from 2005 levels by 2035, and our goal to achieve net zero carbon by 2050". This latest price increase does nothing to encourage your customers to join the fight against carbon reduction. I look forward to your reply! Sincerely, Julie A. Freemole

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #f1730b89

**Response:**

Hi Julie,

Thank you for reaching out.

SRP has updated the pricing proposal with a 5.5% overall increase to solar price plans, a change from the original 5.9% published increase. Please see the link here for the full proposal:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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 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.

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**Name: donald carbonetti**

**Record Number:** 9f36d836  
**Delivery Method:** Digital Submission  
**Received Date:** 12/4/2024

**Comment:**

why do prices always go up, never down?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#9f36d836

**Response:**

Hi Donald,

This proposal would increase average residential bills by 3.5% (\$5.61 per month), though actual impacts will vary by price plan and usage. 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 is also dedicated to providing additional assistance to lower-income customers, expanding eligibility requirements to reach more customers.

For more details on the pricing proposal, please visit [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: Christopher Kozlowski

**Record Number:** 17924e58  
**Delivery Method:** Digital Submission  
**Received Date:** 12/4/2024

**Comment:**

We have solar on our house and the current buyback rate from SRP is extremely low. I think that it is only right that if the prices increase, so should the buyback rates. Will SRP increase the buyback rate of the energy we produce? Having a higher buyback rate could incentivize other homeowners to get solar, thus helping reduce the strain on the power grid.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #17924e58

**Response:**

Hi Christopher,

Thank you for the comments.

As part of this proposal, the export credit changes from 2.81 cents to 3.45 cents. Please see the link here for the full proposal:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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.

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## Name: Jason Taurins

**Record Number:** 0f79ede6  
**Delivery Method:** Digital Submission  
**Received Date:** 12/4/2024

**Comment:**

Why raise prices now, when families are already hurting and stretching budgets thin? We all know you're going to do the same thing again after this price increase - you won't lower it once you recoup your investment, because there will be some new investment, ad nauseam. I hate to be cynical, but your price is already higher than other places in the state. You say your prices are so low, but I've never lived in a place with higher rates than you currently have. Get the money elsewhere.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #0f79ede6

**Response:**

Hi Jason,

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. Additionally SRP's prices currently and under the proposal remain lower than average prices in Arizona based on EIA-861M data and have risen slower than general inflation in the economy.

To help customers save on their electricity bills, SRP offers a variety of [energy efficiency rebates and resources](#) 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 [srp.net/heretohelp](http://srp.net/heretohelp). This proposal increases average residential bills by 3.5% (\$5.61 per month), though actual impacts will vary by price plan and usage.

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**Name: Sarah Finger****Record Number:** 48885042**Delivery Method:** Digital Submission**Received Date:** 12/5/2024**Comment:**

The question I pose, pertains to utility price increases compared to economic wage increases. As an employer, many of those employees, are also customers, I would imagine: does SRP plan or have a wage increase to all employees in this same time frame? Not a performance based increase, but an actual cost of living wage increase of any type? I feel as a corporation, it is only ethical to consider whether this increase will make it more difficult to make ends meet. The cost of all basic goods and services has increased, while wages remain unchanged. Thank you for your time.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #48885042**Response:**

Hi Sarah,

Thank you for your question around corporate employee wage increases.

SRP considers employee wage increases on annual basis through either an individual, performance-based program, or a collective bargaining agreement. The funds for the increases are determined by a review of the external labor market and SRP's financial ability to reward employees.

An additional cost-of-living adjustment is not being considered, nor has it been in the past, to counter potential utility price increases.

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## Name: Derek Engle

**Record Number:** 0834a3cd  
**Delivery Method:** Digital Submission  
**Received Date:** 12/6/2024

**Comment:**

Can you provide a detailed comparison of service costs incurred by SRP per proposed residential 'tier' that justifies the additional MSC to customers with existing single-family homes? Everything I'm seeing in the Cost Allocation Study is broken down by price plan with no reference to tiers (unless I'm missing something). Although I can easily see an argument for different costs to connect to new construction single-family homes vs. new construction apartments--for example, more and longer feeders for homes, but larger feeders and metering distribution enclosures for apartments--I am failing to see how existing single-family homes would be more expensive to maintain service to than existing apartments. (If anything, I'd expect apartments with individual unit metering will incur more customer service costs as residents continually move in and out, generating more service start and stop requests). If it is related primarily to the size of service drop (as suggested on pg. 10 Selected Electric Utility Trends, Concentric Energy Advisors 2-2-24), then MSCs should be based on service drop size rather than residence type (so the proposed plan could have 2 tiers: 225A or less and above 225A, or 3 tiers: 100A or less, 101-225A, and above 225A).

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #0834a3cd

**Response:**

Hi Derek,

Thank you for reaching out.

On page 48 of the Cost Allocation Study, the sigma non-coincident peaks ( $\Sigma$ NCP) are referenced for the 3 dwelling type tiers. This is used as the basis for the differentiated distribution facilities cost.

As part of this tiering proposal, only the distribution facilities costs are differentiated by tier. In the interest of simplicity, customer service and meter costs are the same for all tiers.

Amperage of the service entrance is used in both tier 2 and tier 3. For customers with larger than 225 amp entrances, SRP requires a special type of meter. SRP maintains meter records for all customers. For customers who have 225 or less amps, the meter type is the same whether it's 100 amps or 200 amps. SRP has construction data on service entrances, but it is incomplete, particularly for dwellings older than the 1980s. If SRP based all tiers only on amperage, SRP

would have to physically examine service entrances for thousands of customers. Multifamily dwellings (tier 1) generally have lower amperage service entrances than single family homes (which makes up the bulk of tier 2); many have 150 amp or lower entrances, while single family homes in Phoenix rarely have those.

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**Name: Glenn Mabley**

**Record Number:** ef8b38cf  
**Delivery Method:** Digital Submission  
**Received Date:** 12/9/2024

**Comment:**

I find it alarming that a utility company of this size would allow so much ambiguity in explaining lapses in normal day-to-day maintenance. Having spent 45 years in technology (as a Global Director of IT for the world's largest coating company), I find the use of terms such as "aging infrastructure", "evolving power grid", "enhancing customer programs...", WORD SALAD! Costs of software fees alone are outrageous! What kind of software are you using? Developing? Enhancing? SRP's industry is not new and there are less expensive applications out there for the price you are paying AND they do not require customizations (a term that defines spaghetti code, undocumented and costly to maintain.) Maybe it is time you took an objective view of your entire operations, especially your IT Department. Your meetings are nothing more than meetings to allow customers to vent. As with any other utility company, your decisions are already made!

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #ef8b38cf

**Response:**

Hi Glenn,

Thank you for your question. The primary drivers of the need for a base increase are associated with grid maintenance and operations costs. SRP customers expect reliable and safe delivery of power. To that end, SRP must maintain and replace aging critical infrastructure. In most cases, due to inflation, the infrastructure must be replaced at a higher cost than the original installed cost. SRP has spent approximately \$2.6 billion on maintenance improvements and replacements of transmission and distribution equipment since 2019. Additionally, SRP has 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). Further, SRP has spent approximately \$211 million on customer metering systems since May 2019, which includes new meters for customer growth and solar growth, transitioning Elster meters to L+G meters, maintaining the current prepay solution until Central Prepay is implemented, and replacements for non-functioning meters to support daily operations.

However, SRP has made significant efforts to control costs such as:

- Utilized existing, refurbished turbines instead of more expensive, new

turbines, for the Coolidge and Copper Crossing natural gas expansion projects. This resulted in over \$102 million in total cost savings, as well as a quicker construction timeframe.

- Performed ongoing investment recovery activities, including selling scrap metal, materials and assets that are no longer needed for business activities. Over \$14 million in revenue was generated during Fiscal Year 2024 due to these efforts.
  - Implemented 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.
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**Name: bhishm naraine**

**Record Number:** e4b05a25  
**Delivery Method:** Digital Submission  
**Received Date:** 12/10/2024

**Comment:**

It is extremely important that SRP consider the impact of price increase on the aged population, especially those who are on fixed income. While money is the driver for greedy corporations, who simply look at the over gain, the lives of people are at stake and a tiny increase will put some in poverty levels, which I know you not care about. The price of providing 1 watt of electricity has not changed unless you cannot manage the business proficiently, either by additional employees, pay, taxes, etc. But you get an enormous amount of government subsidies. So what justifies an increase in price? Corporate greed does not justify it!

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #e4b05a25

**Response:**

Bhishm,

Thank you for your question. The primary reason for the need for a price increase is associated with grid maintenance and operations costs. SRP customers expect reliable and safe delivery of power. To that end, SRP must maintain and replace aging critical infrastructure. In most cases, due to inflation, the infrastructure must be replaced at a higher cost than the original installed cost. SRP has spent approximately \$2.6 billion on maintenance improvements and replacements of transmission and distribution equipment since 2019. Additionally, SRP has 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). Further, SRP has spent approximately \$211 million on customer metering systems since May 2019, which includes new meters for customer growth and solar growth, transitioning Elster meters to L+G meters, maintaining the current prepay solution until Central Prepay is implemented, and replacements for non-functioning meters to support daily operations.

However, SRP has made significant efforts to control costs such as,

- Utilized existing, refurbished turbines instead of more expensive, new turbines, for the Coolidge and Copper Crossing natural gas expansion projects. This resulted in over \$102 million in total cost savings, as well as a

- quicker construction timeframe.
- Performed ongoing investment recovery activities, including selling scrap metal, materials and assets that are no longer needed for business activities. Over \$14 million in revenue was generated during Fiscal Year 2024 due to these efforts.
- Implemented 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.

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.

Thank you for reaching out.

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# SRP Public Price Process

## Responses from: 1/14/2025

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**Name: David Bender**

**Record Number:** ecb014ee  
**Delivery Method:** Digital Submission  
**Received Date:** 12/11/2024

**Comment:**

1. Please provide your spreadsheets, workpapers, and underlying data supporting the Cost Allocation Study, including both the embedded cost of service study and the marginal cost of service study, in unlocked electronic format with all formulas, functions, and underlying data intact. 2. Please produce the hourly (or sub-hourly if available) load data for all residential customers used for the Cost Allocation Study, including two-channel data separating inflow and outflow at the revenue meter and generation data for Residential Solar customers. Please produce the data in anonymized and electronic format and identify which residential customers are solar customers and the rate schedule for each customer. 3. Please produce all calculations of your hourly system lambda conducted within the last three years. 4. Please produce the results of any system dispatch and-or expansion modeling conducted within the most recent four years that covers future periods. This includes, but is not limited to, modeling conducted with PLEXOS, AURORA, AFRY BID3, NREL ReEDS, or similar software and any financial modeling related to your decisions to build or procure new generation resources. 5. Please produce the hourly energy price data for the CAISO External Load Aggregation Point used to calculate the "Per Exported kWh Credit" of \$0.0308-kWh value proposed for the E-16 and E-28 price plans. Please produce the data in electronic format with all functions and cross references intact. 6. Please produce the sub-hourly energy prices equal to the locational marginal price specified for the CAISO-administered Western Energy Imbalance Market Load Aggregation Point (ELAP), as specified in tariff QF-24, for all periods during the most recent three years. 7. Please produce any projection of future expected hourly or sub-hourly ELAP energy prices conducted in the most recent three years. 8. Produce the spreadsheets with all inputs, functions, and cross-references included and unlocked for Figure 1 on page 76 of the Cost Allocation Study. 9. State whether the retail revenues in Schedule 10 of the Cost Allocation Study (Row 6 and Row 15) for Residential Solar (e.g., E-13, E-14, E-15 and E-27) are net of any credits provided to the customer for their exported electricity and, if so, how the value to SRP for receipt and use of exported electricity is accounted for when calculating the current and proposed return.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #ecb014ee

**Response Attachments:** SRP Management Response to Earth Justice First Request for Information\_EJ01.docx; FP25 FY26 Cost Allocation Study - Published 12-02-2024\_EJ01.xlsx; FP25 Financial Plan Model - CAS Inputs\_EJ01.xlsm; Customer Systems Study - FP25\_EJ01.xlsx; FY24 Typical Loads and Demand Characteristics (Interval Data)\_EJ01.xlsx; FP25 v5 Phase 2 Revenue Model Outputs for Price Process\_EJ01.xlsx; LOLP Study Resultst\_EJ01.xlsx; Weighted Avg Marginal Energy Cost\_EJ01.xlsx; GSU assets data 4-30-24\_EJ01.xlsx; Lighting Distribution O&M\_PP25\_EJ01.xlsx; Meter Depr FY23 - Aug FY25\_EJ01.xlsx; Streetlights assets data projected NBV 4-30-25\_EJ01.xlsx; Marginal Cost Study FY24\_EJ01.xlsx; Energy & Demand Prices FY24\_EJ01.xlsx; Sub-Hourly ELAP\_EJ01\_EJ01.xlsx; CAISO RTM Hourly External Load Aggregation Point (ELAP\_SRP-APND)\_EJ01.xlsx; resandressolar\_allusage\_EJ01.sas7bdat; 20221117\_Power\_McClellan\_Phase2CCERC-SRPInstallationAdvancedSolar\_ppt\_EJ01.pdf; 20210913\_D\_Board\_Barr\_SmedleyCoolidgeExpansionProject\_ppt\_EJ01.pdf; 20220823\_Power\_Smedley\_McClellan\_ApprovalTwoGas Units\_ppt\_EJ01.pdf; 20210824\_Power\_Smedley\_Wilhelm\_McClellan\_ApprovalCoolidgeExpansionProject\_ppt\_EJ01.pdf; 20230627\_Power\_Taylor\_Olsen\_CoolidgeExpansionProjectUpdate\_ppt\_EJ01.pdf;

*\*To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #ecb014ee*

**Response Sent by CSO** 1/14/2025 4:59 PM

**Response:**

**SRP Management Response to  
Earth Justice's First Request for Information Regarding  
SRP's Proposed Changes to its Electric Rate Schedules**

1. Please provide your spreadsheets, workpapers, and underlying data supporting the Cost Allocation Study, including both the embedded cost of service study and the marginal cost of service study, in unlocked electronic format with all formulas, functions, and underlying data intact.

**SRP Response:** See attached files:

- **FP25 FY26 Cost Allocation Study - Published 12-02-2024.xlsx** - The worksheets are protected to prevent inadvertent edits but there is no password.
  - **FP25 Financial Plan Model - CAS Inputs.xlsm** - This model is owned by MCR Consulting Services. Per SRP's licensing agreement with them, SRP has limited rights over sharing the entire model. This limited model provides a comprehensive view of the financial data for the FP25 FY26 test year.
  - **Customer Systems Study - FP25.xlsx**
  - **FY24 Typical Loads and Demand Characteristics (Interval Data).xlsx**
  - **FP25 v5 Phase 2 Revenue Model Outputs for Price Process.xlsx**
  - **LOLP Study Results.xlsx**
  - **Weighted Avg Marginal Energy Cost.xlsx**
  - **Marginal Cost Study FY24.xlsx**
  - **Energy & Demand Prices FY24.xlsx** - Calculates energy price and demand price by hour and month, which feeds in the MCS.
  - **GSU assets data 4-30-24.xlsx**
  - **Lighting Distribution O&M\_PP25.xlsx**
  - **Meter Depr FY23 - Aug FY25.xlsx**
  - **Streetlights assets data projected NBV 4-30-25.xlsx**
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1. Please produce the hourly (or sub-hourly if available) load data for all residential customers used for the Cost Allocation Study, including two-channel data

separating inflow and outflow at the revenue meter and generation data for Residential Solar customers. Please produce the data in anonymized and electronic format and identify which residential customers are solar customers and the rate schedule for each customer.

**SRP Response:** SRP cannot provide individual customer data. Attached are the results of a query (resandressolar\_allusage.sas7bdat) of all residential and residential solar usage for accounts used in the Price Process grouped for each 15-minute interval by rate, date, and solar status. DEL01-DEL96 show energy delivered by SRP to the customer. EXP01-EXP96 shows energy the customer exported to the grid. And GEN01-GEN96 shows self-generation from the customer, if any.

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

**SRP Response:** This response is in process. SRP management will provide its response in a supplementary document.

1. Please produce the results of any system dispatch and-or expansion modeling conducted within the most recent four years that covers future periods. This includes, but is not limited to, modeling conducted with PLEXOS, AURORA, AFRY BID3, NREL ReEDS, or similar software and any financial modeling related to your decisions to build or procure new generation resources.

**SRP Response:** Attached are the relevant presentations that were provided in the most recent four years by SRP management in open meetings of SRP's Board of Directors or its Power Committee. These presentations contain summaries of the results of modeling that informed decisions to build or procure new generation resources, including modeling conducted to compare resource alternatives.

- 2021-09-13 Board - Supplemental Coolidge Expansion Project  
20210913\_D\_Board\_Barr\_SmedleyCoolidgeExpansionProject\_ppt\_EJ01
- 2021-08-24 Power Committee - Request to Approve Coolidge Expansion Project  
20210824\_Power\_Smedley\_Wilhelm\_McClellan\_ApprovalCoolidgeExpansionProject\_ppt\_EJ01
- 2023-06-27 Power Committee - Coolidge Expansion Project Update  
20230627\_Power\_Taylor\_Olsen\_CoolidgeExpansionProjectUpdate\_ppt\_EJ01
- 2022-08-23 Power Committee - Approval of Installation of Two Gas-Fired Generating Units and Site Preparation Work for Advanced Solar and Long-Duration Storage  
20220823\_Power\_Smedley\_McClellan\_ApprovalTwoGasUnits\_ppt\_EJ01
- 2022-11-17 Power Committee - Copper Crossing Energy and Research Center Phase 2  
20221117\_Power\_McClellan\_Phase2CCERC-SRPInstallationAdvancedSolar\_ppt\_EJ0

1. Please produce the hourly energy price data for the CAISO External Load Aggregation Point used to calculate the “Per Exported kWh Credit” of \$0.0308-kWh value proposed for the E-16 and E-28 price plans. Please produce the data in electronic format with all functions and cross references intact.

**SRP Response:** For energy price data used to calculate the export credit, see attachment **CAISO RTM Hourly External Load Aggregation Point (ELAP\_SRP-APND)\_EJ01**. Please note that SRP management published a modified proposal that revised the rate from \$0.0308 to \$0.0345. For more detail on the modifications, please see [Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective Nov 2025.pdf](#).

1. Please produce the sub-hourly energy prices equal to the locational marginal price specified for the CAISO-administered Western Energy Imbalance Market Load Aggregation Point (ELAP), as specified in tariff QF-24, for all periods during the most recent three years.

**SRP Response:** Please see attachment **Sub-Hourly ELAP\_EJ01**.

1. Please produce any projection of future expected hourly or sub-hourly ELAP energy prices conducted in the most recent three years.

**SRP Response:** All future expected energy prices considered as part of the Price Process are included in the CAS and MCS files included above.

1. Produce the spreadsheets with all inputs, functions, and cross-references included and unlocked for Figure 1 on page 76 of the Cost Allocation Study.

**SRP Response:** Included in the **FP25 FY26 Cost Allocation Study - Published 12-02-2024.xlsx** file from the response to Question 1.

1. State whether the retail revenues in Schedule 10 of the Cost Allocation Study (Row 6 and Row 15) for Residential Solar (e.g., E-13, E-14, E-15 and E-27) are net of any credits provided to the customer for their exported electricity and, if so, how the value to SRP for receipt and use of exported electricity is accounted for when calculating the current and proposed return.

**SRP Response:** The E-13 and E-14 export credit is included in FPPAM-Energy as stated on page 29 of the Cost Allocation Study. E-27 and E-15 do not have an export credit, the revenues are calculated on the net usage for these Price Plans.

The costs allocated to the solar class fully account for exported energy where applicable. Note that excluding their solar generation, customers on the solar price plans have usage characteristics most similar to customers on the E-26 Price Plan; therefore, comparing per- customer costs in the CAS between the solar price plans and E-26 is a simple high-level approximation of the cost reduction attributable to their solar generation.

Transmission - The Class 4 CP of Solar Price Plans is reduced 1:1 for all exported energy and generation used on-site during the four coincident peak hours that comprise the 4CP allocator. Note that the solar price plans see approximately a 45% reduction in allocated Transmission costs compared to the E-26 Price Plan.

Generation (Peak) - SRP uses the Peak and Average method to allocate Generation costs. For the portion of Generation that is attributable to "Peak," the Class LOLP-Weighted Peak of the solar price plans is reduced 1:1 for all exported energy and generation used on-site during each hour. Note that the solar price plans see approximately a 15% reduction in allocated Generation (Peak) costs compared to the E-26 Price Plan.

Generation (Average) - For the portion of Generation that is attributable to "Average," costs are allocated based on delivered kWh. This more equitably allocates costs to classes based on how much they use SRP generation resources. Note that the solar price plans see approximately a 30% reduction in allocated Generation (Average) costs compared to the E-26 Price Plan.

FPPAM - Demand - SRP uses the Class LOLP-Weighted Peak to allocate demand-related FPPAM costs (note, per Schedule 1 lines 1-2, there are no Fuel demand-related costs). All demand-related FPPAM costs are Purchased Power such as battery storage. The class LOLP-Weighted Peak of the solar price plans is reduced 1:1 for all exported energy and generation used on-site during each hour. Note that the solar price plans see approximately a 15% reduction in allocated FPPAM - Demand costs compared to the E-26 Price Plan. Note per page 69 of the Cost Allocation Study, that revenues were allocated to classes differently: "For Gradualism purposes, Management proposes that target revenues be comprised of a blend of the old and new cost allocation methodologies; 5% based on the new LOLP-weighted peak MW and 95% based on the previous total MWh methodology."

FPPAM - Energy - SRP uses net loads to allocate FPPAM - Energy and so the costs attributed to the solar price plans are reduced 1:1 for all exported energy and generation used on-site each hour, weighted by the marginal energy costs in that hour. The solar price plans see approximately a 30% reduction in allocated FPPAM - Energy costs compared to the E-26 Price Plan. Also note per page 69 of the Cost Allocation Study, that revenues were allocated to classes differently: "for Gradualism purposes, Management proposes that the target revenues for each class be consistent with past FPPAM allocation methodology of the class proportion of loss-adjusted MWh."

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**Name: Jamie Velez**

**Record Number:** AR182ff645  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 182ff645  
Original Comment Date: 12/2/2024  
Original Response Date: 12/8/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR182ff645

**Response:**

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 182ff645, concerning SRP's Pricing Process:

Thank you for your questions.

SRP last conducted a pricing process in 2019. On March 25, 2019, the SRP

Board of Directors approved an overall average annual price decrease of 2.2% that took effect on the May 2019 billing cycle. Management is proposing to the Board an overall 2.4% net price increase effective with the November 2025 billing cycle. SRP is a community-based, nonprofit utility. Revenues are reinvested back into our electric grid for the benefit of all customers. If approved by SRP's publicly elected Board of Directors, the average residential customer using 1,117 kilowatt-hours (kWh) a month will see a monthly bill increase of 3.5 percent, or \$5.61, effective with the November 2025 billing cycle. Actual bill impacts will vary based on customer usage and price plan. If approved as proposed, SRP customers would still pay among the lowest electricity prices in the southwestern U.S. and the lowest rates of any major utility in the state.

Independent of a pricing process, the Board recently approved an adjustment to the FPPAM (Fuel and Purchased Power Adjustment Mechanism) rate, the component of prices that adjusts in response to changes in costs of fuel and power purchased via contract or on the market. That adjustment resulted in an overall 3.9% increase, effective Nov. 1, 2024.

SRP also offers a variety of bill assistance programs and resources that can be found at [srp.net/heretohelp](http://srp.net/heretohelp).

In addition to optional pricing plans, which help customers manage their electricity bills, SRP offers a variety of [energy efficiency rebates and resources](#) to help customers customize their account, lower their energy use and save money on their bills.

In fiscal year 2024, our Residential & Commercial Energy Efficiency programs provided customers with 603,751 MWh of energy savings.

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## Name: Roger Olson

**Record Number:** AR3949c3e6  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 3949c3e6  
Original Comment Date: 12/2/2024  
Original Response Date: 12/8/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR3949c3e6

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 3949c3e6, concerning SRP's Pricing Process:

Hi Roger,

SRP is proposing to increase average residential bills by 3.5% (\$5.61 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 \$5.61. The MSC is not new, SRP EZ-3 Price Plan™ customers currently pay \$20 a month ([SRP EZ-3 Price Plan | SRP](#)).

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.

SRP is freezing certain residential plans from new customer participation, which does include the SRP EZ-3 Price Plan™ (E-21 and E-22). In place of the frozen price plans, SRP is introducing 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. We encourage customers to try out one of our new price plan offerings, with the reassurance you can move back to your original frozen price plan if aren't satisfied and will be able to remain on it until it's eliminated no later than November 2029.

There are no changes proposed for the Budget Billing program at this time. 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: Nathaniel Taylor

**Record Number:** AR4a4b6294  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 4a4b6294

Original Comment Date: 12/2/2024

Original Response Date: 12/5/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR4a4b6294

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 4a4b6294, concerning SRP's Pricing Process:

Nathaniel,

The overall average increase for residential is 3.5% or \$5.61 a month. However, the actual impact on a particular customer bill will vary depending on usage and price plan.

Thanks!

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## Name: Arabah Woodberry

**Record Number:** AR1b3ae639  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 1b3ae639  
Original Comment Date: 12/2/2024  
Original Response Date: 12/20/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR1b3ae639

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 1b3ae639, concerning SRP's Pricing Process:

Hi Arabah,

This proposal includes changes to all of our price plans, and includes an average 5.5% 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-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.

This proposed change to the MSC is factored into the average residential bill increase of \$5.61.

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## Name: John Oleksey Jr

**Record Number:** AR86c5ef8e  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 86c5ef8e

Original Comment Date: 12/2/2024

Original Response Date: 12/17/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR86c5ef8e

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 86c5ef8e, concerning SRP's Pricing Process:

Hi John,

SRP is proposing to increase average residential bills by 3.5% (\$5.61 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 \$5.61.

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% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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**Name: Michael J Nowak**

**Record Number:** AR6149dd01  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 6149dd01  
Original Comment Date: 12/2/2024  
Original Response Date: 12/4/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#AR6149dd01

**Response:**

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 6149dd01, concerning SRP's Pricing Process:

Hi Michael,

Thank you for reaching out.



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) and is charged every month. 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.

This proposed change to the MSC is factored into the average residential bill increase of \$5.61.

For limited income customers, SRP management is proposing an expansion to, and increase of, our limited income discount, making an estimated 100,000 + more customers eligible for a \$25 per month credit to their bills.

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## Name: Michael Lembo

**Record Number:** AR04973840  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 04973840

Original Comment Date: 12/2/2024

Original Response Date: 12/11/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR04973840

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 04973840, concerning SRP's Pricing Process:

Hi Mike,

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.

This proposed change to the MSC is factored into the average residential bill increase of \$5.61.

This comment you submitted will become part of the public record, and will be made available to SRP's management, officers, and Board of Directors. SRP will be conducting several Open Houses and public board meetings. We invite customers to attend and share feedback.

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## Name: Roger Storms

**Record Number:** AR485f438c  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.  
Record Number: 485f438c  
Original Comment Date: 12/2/2024  
Original Response Date: 12/20/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR485f438c

**Response:**

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 485f438c, concerning SRP's Pricing Process:

Hi Roger,

Thanks for reaching out.

This proposal increases average residential bills by 3.5% (\$5.61 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 (\$7.39 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: Joyce Lucas

**Record Number:** AR51bc04f0  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.  
Record Number: 51bc04f0  
Original Comment Date: 12/3/2024  
Original Response Date: 12/5/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR51bc04f0

**Response:**

Hi Joyce,

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 51bc04f0, concerning SRP's Pricing Process:

This proposal increases average residential bills by 3.5% (\$5.61 per month), though actual impacts will vary by price plan and usage.

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.

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## Name: Kelly Harris

**Record Number:** AR8694ac91  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 8694ac91

Original Comment Date: 12/4/2024

Original Response Date: 12/14/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR8694ac91

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 8694ac91, concerning SRP's Pricing Process:

Hi Kelly,

This proposal would increase average residential bills by 3.5% (\$5.61 per month), though actual impacts will vary by price plan and usage. 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 is also dedicated to providing additional assistance to lower-income customers, expanding eligibility requirements to reach more customers.

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% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: K Losey

**Record Number:** AR3a4317ca  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 3a4317ca

Original Comment Date: 12/4/2024

Original Response Date: 12/14/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR3a4317ca

### Response:

Hi K Losey,

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 3a4317ca, concerning SRP's Pricing Process:

Hello,

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:

The proposed average increase of 3.5% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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**Name: Kenneth G Hummel**

**Record Number:** ARdb963de7  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: db963de7

Original Comment Date: 12/3/2024

Original Response Date: 12/20/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #ARdb963de7

**Response:**

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number db963de7, concerning SRP's Pricing Process:

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 3.45 cents.

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## Name: Chris Hammer

**Record Number:** ARA063281e  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: a063281e

Original Comment Date: 12/4/2024

Original Response Date: 12/20/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #ARA063281e

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number a063281e, concerning SRP's Pricing Process:

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% (\$5.61 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

5.5% average increase (\$7.39 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: Joseph Bonamo

**Record Number:** AR9184cc82  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 9184cc82

Original Comment Date: 12/4/2024

Original Response Date: 12/17/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR9184cc82

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 9184cc82, concerning SRP's Pricing Process:

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

SRP is proposing to increase average residential bills by 3.5% (\$5.61 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 \$5.61.

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% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: Caroline Carney

**Record Number:** AR2f981672  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 2f981672

Original Comment Date: 12/4/2024

Original Response Date: 12/11/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR2f981672

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 2f981672, concerning SRP's Pricing Process:

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

As a community-based, not-for-profit utility, SRP aims to bill each customer for the cost to serve electricity for that customer. In a price process, changes are made to

each plan to get closer to that goal. In this proposal, this means that price plans designed for solar customers have a larger percentage increase than some other residential plans. In this proposal, SRP management proposes that all classes have revenue increases between 1.3% and 5.5%.

The proposal includes two new price plans (E-16 and E-28) 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.

As proposed, both the E-16 and E-28 price plans provide the rate at which SRP will credit the customer for energy exported to SRP. That export rate is based on a three-year average of the real-time market price of exported energy. That rate differs from the retail price because SRP must cover the costs of providing reliable electric service. 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.

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## Name: Matt Haines

**Record Number:** AR0664bfe7  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 0664bfe7

Original Comment Date: 12/3/2024

Original Response Date: 12/17/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#AR0664bfe7

### Response:

Hi Matt,

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 0664bfe7, concerning SRP's Pricing Process:

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

SRP is proposing to increase average residential bills by 3.5% (\$5.61 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 \$5.61.

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% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 [Budget Billing for residential customers | 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.

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## Name: Justin Walker

**Record Number:** AR25d01505  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 25d01505  
Original Comment Date: 12/3/2024  
Original Response Date: 12/14/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR25d01505

### Response:

Hi Justin,

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 25d01505, concerning SRP's Pricing Process:

Hello Justin,

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:

The proposed average increase of 3.5% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: John Tayeh

**Record Number:** AR003ba081  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 003ba081

Original Comment Date: 12/2/2024

Original Response Date: 12/11/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR003ba081

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 003ba081, concerning 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.

This proposed change to the MSC is factored into the average residential bill increase of \$5.61.

Per SRP's Rules and Regulations, SRP will assess a Customer a service fee each time SRP is requested to establish or re-establish Distribution service to that Customer. As necessary, SRP will redetermine the service fee from time to time to reasonably compensate SRP for associated costs.

[Salt River Project rules and regulations | SRP](#)

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## Name: Sheila Thomas

**Record Number:** AR3752a6cc  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 3752a6cc

Original Comment Date: 12/2/2024

Original Response Date: 12/14/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR3752a6cc

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 3752a6cc, concerning SRP's Pricing Process:

The average residential bill will increase about 3.5% or \$5.61. 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.

Among residential customers, there are a variety of dwellings with differences in the cost to serve. In recognition of these differences and to better align prices with costs, Management is proposing three tiers of monthly service charge (MSC) that will apply to all

residential and residential solar price plans based on the type of dwelling and the amperage level of the 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 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, so only part of these costs is recovered through the MSC, with the rest recovered through per-kWh energy charges.

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## Name: Jo Gambosi

**Record Number:** AR88a9cdd1  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 88a9cdd1

Original Comment Date: 12/4/2024

Original Response Date: 12/9/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR88a9cdd1

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 88a9cdd1, concerning SRP's Pricing Process:

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

This proposal increases average residential bills by 3.5% (\$5.61 per month) regardless of location, though actual impacts will vary by price plan and usage.

- 3.4% average increase (\$5.51 per month) for residential customers without solar
- 5.5% average increase (\$7.39 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

Although SRP does not offer a specific discount for seniors, there are various options available to help customers save on their bill. The Economy Price Plan, 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.

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## Name: Charles L Wilkinson Sr

**Record Number:** ARcf7fc6da  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: cf7fc6da

Original Comment Date: 12/5/2024

Original Response Date: 12/17/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #ARcf7fc6da

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number cf7fc6da, concerning SRP's Pricing Process:

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% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

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## Name: Jenny Jones

**Record Number:** AR276b3269  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 276b3269

Original Comment Date: 12/5/2024

Original Response Date: 12/9/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#AR276b3269

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 276b3269, concerning SRP's Pricing Process:

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

If approved by SRP's publicly elected Board of Directors, the average residential customer using 1,117 kilowatt-hours (kWh) a month will see a monthly bill increase of 3.5 percent, or \$5.61, effective with the November 2025 billing cycle.



Actual bill impacts will vary based on customer usage and price plan. If approved as proposed, SRP customers would still pay among the lowest electricity prices in the southwestern U.S. and the lowest rates of any major utility in the state.

SRP last conducted a pricing process in 2019. On March 25, 2019, the SRP Board of Directors approved an overall average annual price decrease of 2.2% that took effect on the May 2019 billing cycle. Unrelated to a pricing process, SRP's publicly elected Board of Directors recently approved an adjustment to the Fuel and Purchased Power Adjustment Mechanism (FPPAM) rate that resulted in an overall 3.9% increase, effective Nov. 1, 2024. The FPPAM process was to update the component of prices that adjusts more frequently in response to changes in costs of fuel and power purchased via contract or on the market.

SRP continues to focus 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 the most cost-effective and efficient manner while meeting or exceeding annual objectives. These efforts have saved millions of dollars and include:

- As financial market opportunities arise, debt is refinanced at lower interest rates to lower overall interest expense. Over \$2.6 billion of revenue bonds have been refinanced since May 2015, with another \$300 million scheduled to be refinanced in 2025. The finalized refinancing transactions achieve net present value interest savings in excess of \$18 million per year, on average, from Fiscal Year 2015 through Fiscal Year 2038.
- 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.
- Information Technology Services (ITS) has implemented cost controlling practices 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 has resulted in lower prices for two projects since 2021.
- 11 of 12 combined cycle gas units have been upgraded with enhanced turbine hardware, which has enabled improved emissions, increased unit capacity, and reduced heat rate/fuel cost.
- Developed, and utilized, 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.

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## Name: Rebecca Ghena

**Record Number:** AR898fafea  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.  
Record Number: 898fafea  
Original Comment Date: 12/8/2024  
Original Response Date: 12/14/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR898fafea

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 898fafea, concerning SRP's Pricing Process:

Hello Rebecca,

Thank you for your question.

The proposed average increase of 3.5% (\$5.61 per month) for residential customers is an average across all residential customers and reflects all proposed price changes. It depends on the rate at which the increase is coming from. This increase may come from different part of your bill, such as the monthly service

charge, demand charges, energy charges, or a combination of these components.

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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#).

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## Name: larry Snitzer

**Record Number:** AR0c185a5e  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.

Record Number: 0c185a5e  
Original Comment Date: 12/9/2024  
Original Response Date: 12/14/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR0c185a5e

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 0c185a5e, concerning SRP's Pricing Process:

This proposal increases average residential bills by 3.5% (\$5.61 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

5.5% average increase (\$7.39 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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

Your SRP bill will be lower with solar generation than it would be without, and the remaining SRP bill amount is 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 from solar are based on the cost reduction SRP experiences when you install solar, not on the cost you paid for the solar panels. Whether your SRP bill savings exceed the cost of your solar panels will depend on a variety of factors including how they perform and what you paid for them.

Although it is not part of the pricing proposal, 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 (RECs), 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.

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## Name: Nancy Damone

**Record Number:** AR5e627a3c  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.  
Record Number: 5e627a3c  
Original Comment Date: 12/10/2024  
Original Response Date: 12/11/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR5e627a3c

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 5e627a3c, concerning SRP's Pricing Process:

Hello Nancy,

Thank you for your question.

This proposal increases average residential bills by 3.5% (\$5.61 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
- 5.5% average increase (\$7.39 per month) for residential customers with solar

For more details on the pricing proposal, please visit [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

Although SRP does not offer a specific discount for our older customers, there are various options available to help customers save on their bill. The Economy Price Plan, 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.

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

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## Name: Madison Reynolds

**Record Number:** ARcaa943ff  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.  
Record Number: caa943ff  
Original Comment Date: 12/10/2024  
Original Response Date: 12/13/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #ARcaa943ff

### Response:

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number caa943ff, concerning SRP's Pricing Process:

Thank you for your questions and your interest in SRP.

SRP last conducted a pricing process in 2019. On March 25, 2019, the SRP Board of Directors (the "Board") approved an overall average annual price decrease of 2.2% that took effect on the May 2019 billing cycle. In a separate



process, the Board recently approved an adjustment to the Fuel and Purchased Power Adjustment Mechanism (FPPAM) rate that resulted in an overall 3.9% increase, effective Nov. 1, 2024. The FPPAM process was to update the component of prices that adjusts more frequently in response to changes in costs of fuel and power purchased via contract or on the market.

This proposal increases average residential bills by 3.5% (\$5.61 per month), effective with the November 2025 billing cycle, though actual impacts will vary by price plan and usage. The proposed price changes are 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.

In response to your comment on operational efficiency, 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 cost-effective 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.

Additionally, as financial market opportunities arise, SRP refinances debt at lower interest rates to lower overall interest expense. Over \$2.6 billion of revenue bonds have been refinanced since May 2015, with another \$300 million scheduled to be refinanced in 2025. The finalized refinancing transactions achieve net present value interest savings in excess of \$18 million per year, on average, from Fiscal Year 2015 through Fiscal Year 2038.

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**Name: Albert Prano**

**Record Number:** AR9059542c  
**Delivery Method:** Digital Submission  
**Received Date:** 1/6/2025  
**Comment:**

Comment requiring an amended response from SRP due to Modifications SRP made to its Pricing Proposal on 12/30/2024.  
Record Number: 9059542c  
Original Comment Date: 12/11/2024  
Original Response Date: 12/20/2024

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #AR9059542c

**Response:**

We are reaching out to let you know that SRP management has made a few updates to its price proposal. The updated materials, as well as a description of the changes, are available here:

[Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#)

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

[Modifications to the Proposed Adjustments to SRP's Standard Electric Price Plans and Appendix A Effective with the November 2025 Billing Cycle](#)

In light of the updates, the following supersedes the response you previously received to your inquiry, record number 9059542c, concerning SRP's Pricing Process:

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 [energy efficiency rebates and resources](#) 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 [srp.net/heretohelp](http://srp.net/heretohelp). This proposal increases average residential bills by 3.5% (\$5.61 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.

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# SRP Public Price Process Responses from: 1/15/2025

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## **Name: Heidi Hopkins**

**Record Number:** 516bfd99  
**Delivery Method:** Digital Submission  
**Received Date:** 12/21/2024

### **Comment:**

So in a typical residential home, it'll be a \$5.51 monthly increase but then also an increase in the monthly fee from \$20-30 dollars. So it'll actually be about a \$15.51 monthly increase? Am I understanding this correctly?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #516bfd99

### **Response:**

Hi Heidi,

Thanks for reaching out.

The proposed average increase of 3.5% (\$5.61 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 \$8.77
- Tier 3 (\$40 MSC): Average monthly bill increase of \$15.37

This proposed change to the MSC is factored into the average residential bill increase of \$5.61.

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.

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## Name: Kevin Higgins

**Record Number:** 68498ddc  
**Delivery Method:** Digital Submission  
**Received Date:** 12/23/2024

**Comment:**

Greetings, My name is Kevin Higgins. I am a Principal with Energy Strategies, a consulting firm working on behalf of the Arizona Large Customer Group (AZLCG) and its members, Freeport McMoRan, ASARCO, and Google. By way of background, I have participated in a number of previous SRP Pricing Processes on behalf of large SRP customers dating back to the late 1990s. The purpose of this message is to request certain information as part my efforts to assist AZLCG members in their evaluation of SRP's Proposed Pricing Plan. To that end, can you please provide the following documents in support of SRP's proposed Pricing Plan: 1. FR25 6-Year Financial Plan (FY26) 2. Fuel Budget FR25 3. FP25 Capital Budget 4. Cost Allocation Study, Appendix A Supporting Files 5. Excel workpapers, with formulas intact, supporting the Cost Allocation Study. Please feel free to email me or call (602-524-4404) with any questions or concerns regarding this request. Respectfully, Kevin Higgins, Energy Strategies

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #68498ddc

**Response Attachments:** Pricing Data Request\_1A\_1C\_December 2024\_AZLCG01.xlsx; FP25 FY26 Cost Allocation Study - Published 12-02-2024\_AZLCG01.xlsx; FP25 Financial Plan Model - CAS Inputs\_AZLCG01.xlsm; Customer Systems Study - FP25\_AZLCG01.xlsx; FY24 Typical Loads and Demand Characteristics (Interval Data)\_AZLCG01.xlsx; LOLP Study Results\_AZLCG01.xlsx; Weighted Avg Marginal Energy Cost\_AZLCG01.xlsx; FP25 v5 Phase 2 Revenue Model Outputs for Price Process\_AZLCG01.xlsx; FY25 Price Process Yellow Book Schedules\_AZLCG01.xlsx; SRP Management Response to AZLCG's First Request for Information\_AZLCG01.pdf;

*\*To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #68498ddc*

**Response:**

Hi Kevin,

Please find SRP Management's Response to your request for information below and attached:

1. Can you please provide the following documents in support of SRP's proposed Pricing Plan: a. F[P]25 6-Year Financial Plan (FY26) b. Fuel Budget F[P]25 c. FP25 Capital Budget d. Cost Allocation Study, Appendix A Supporting Files e. Excel workpapers, with formulas intact, supporting the Cost Allocation Study

**SRP Response:** See the following attachments for FY25 and FY26 of the 2025 Financial Plan. All other years are confidential.

a. **Pricing Data Request\_1A\_1C\_December 2024\_AZLCG01.xlsx**

b. See **FP25 FY26 Cost Allocation Study - Published 12-02-2024\_AZLCG01.xlsx** for data regarding the Fuel and Purchased Power Adjustment Mechanism (FPPAM) budget. FP25 projections for test year FY26 FPPAM expenses can be found broken out by resource type on lines 1-15 of Schedule 1a. Additionally, rows 11-13 and 33-35 of Schedule 9 show the projected FPPAM revenues under both current and proposed prices respectively.

c. **Pricing Data Request\_1A\_1C\_December 2024\_AZLCG01.xlsx**

d. See the "Appx A" tab in the Cost Allocation Study excel workbook included in part e.

e. Name of files for Excel workpapers, with formulas intact, supporting the Cost Allocation Study:

i. **FP25 FY26 Cost Allocation Study - Published 12-02-2024\_AZLCG01.xlsx** - The worksheets are protected to prevent inadvertent edits but there is no password.

ii. **FP25 Financial Plan Model - CAS Inputs\_AZLCG01.xlsm** - This model is owned by MCR Consulting Services. Per our licensing agreement with them, we have limited rights over sharing the entire model. This limited model provides a comprehensive view of the financial data for the FP25 FY26 test year.

iii. **Customer Systems Study – FP25\_AZLCG01.xlsx**

iv. **FY24 Typical Loads and Demand Characteristics (Interval Data)\_AZLCG01.xlsx**

v. **FP25 Revenue Model Outputs for Price Process.\_AZLCG01xlsx**

vi. **LOLP Study Results\_AZLCG01.xlsx**

vii. Weighted Avg Marginal Energy Cost\_AZLCG01.xlsx viii. FY25 Price Process Yellow Book Schedules\_AZLCG01.xlsx

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**Name: Steve Neil**

**Record Number:** MI6927828  
**Delivery Method:** Email to Corporate Secretary  
**Received Date:** 1/14/2025  
**Attachments:** 20250113\_Neil\_Request.pdf

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

**Comment:**

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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**Response Subject:** SRP Corporate Pricing Response to Public Comment #MI6927828

**Response Attachments:** LOLP Study Resultst\_SN08.xlsx; Energy & Demand Prices FY24 v2\_SN08.xlsx; MCS FY24 Links Broken\_SN08.xlsx;

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

**Response:**

Hi Steve,

Please find the "LOLP Results Study" and "Marginal Cost Study" documents attached.

# SRP Public Price Process Responses from: 1/16/2025

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**Name:** Andy

**Record Number:** 53fcda7b  
**Delivery Method:** Digital Submission  
**Received Date:** 12/6/2024

**Comment:**

Instead of increasing revenue, why not try to reduce costs? A 50% increase in MSC is insane! Also, why are you charging people with solar even more? This is backwards. Please come up with a better plan!

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #53fcda7b

**Response:**

Hi Andy,

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

In response to your question on operational efficiency, 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 cost-effective and efficient manner while meeting or exceeding annual objectives. Key efforts include:

- Performing ongoing 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.

Additionally, as financial market opportunities arise, SRP refinances debt at lower interest rates to lower overall interest expense. Over \$2.6 billion of revenue bonds have been refinanced since May 2015, with another \$300 million scheduled to be refinanced in 2025. The finalized refinancing transactions achieve net present value interest savings in excess of \$18 million per year, on average, from Fiscal Year 2015 through Fiscal Year 2038.

Concerning customers with solar, 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.

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## Name: Greg Overton

**Record Number:** b63b4101  
**Delivery Method:** Digital Submission  
**Received Date:** 12/9/2024

**Comment:**

I strongly oppose the proposed rate increases, especially the higher rates for people with solar energy systems. It's contradictory that we are encouraged to embrace green energy and work towards a sustainable future, yet those who take the initiative to invest in solar and bear the financial burden themselves are penalized by the utility company. This is not only unfair, but it will also discourage others from making the switch to solar, which ultimately helps alleviate strain on our infrastructure. If you all as the company really encourage feedback I'm going to be expecting a response back regarding this.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #b63b4101

**Response:**

Hi Greg,

Thank you for your comments 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.

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 (to be updated each year), which is based on a three-year average of the real-time market prices for energy.

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**Name: roland yellowman**

**Record Number:** 84871a1b

**Delivery Method:** Digital Submission

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

**Comment:**

customer is requesting a price comparison be sent to email on file.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#84871a1b

**Response:**

Hi Roland,

Your bill comparison was sent to the mailing address on file.

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## Name: James Whitfill

**Record Number:** 34b47dea  
**Delivery Method:** Digital Submission  
**Received Date:** 12/11/2024

**Comment:**

I appreciate SRP's approach to equity, gradualism and choice. Do the current economic analysis of the customer generation plans capture the cost impact of removing net metering? If they do not, that seems disingenuous when looking at the proposed cost impacts to the E 27 plan. The replacement with an average export price will have a notable impact itself. A home which mitigates 30KwHr per day via net metering saves about 54\$ per month on the E27 plan. After changing to an export rate of 0.03 that house will only mitigate 27\$ per month via the export credit. This will result in an additional \$27 per month increase on top of the ~6% increase. On a \$300 dollar bill, this is a 9% increase on its own. In the name of gradualism, I would ask that customers who made an investment in a generation system be allowed to have at least 10 years to realize the returns they estimated when they purchased said system. I would ask that net metering remain but at least give current customers 10 years to migrate off their current plan and pay back their investments

---

**Response Subject:** SRP Corporate Pricing Response to Public Comment #34b47dea

**Response:**

Hi James,

Thanks for reaching out.

The proposed increases by price plan (such as E-27) include the current prices and structure.

SRP has over 14,000 customers currently on the E-13 Price Plan, and about 1,000 on the E-14 Price Plan, which are not net metered and currently have an export rate of 2.81 cents. Many customers see comparable or even lower bills under these types of rates than a net metered one like E-27. The export credit amount is only one part of the overall price plan.

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 (TOU) plans and four solar price plans to two TOU plans (E-28 and E-16) that will be available to customers with and without solar. The proposal freezes the existing suite of TOU

plans (including E-27) and introduces the E-28 and E-16 Price Plans 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. 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 (to be updated each year), which is based on a three year average of the real-time market prices for energy.

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.

Your submission, including feedback concerning existing solar customers, will become part of the public record, and will be made available to SRP's management, officers, and Board of Directors.

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## Name: Joe Flicker

**Record Number:** 0feaa2a5  
**Delivery Method:** Digital Submission  
**Received Date:** 12/13/2024

**Comment:**

Rates should not increase. If anything, I have noticed my rates increasing despite my electricity usage being the same or even less than in prior years. It is also not clear to me what is a service charge in this process or why that should increase as well. What services are you providing that are not already part of my base rate?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #0feaa2a5

**Response:**

Hi Joe,

Thank you for 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.

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 SRP's 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 a single unit in multi-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 for a dwelling type not listed in Tier 1 with a service entrance of 225 amps or less.
- Tier 3: \$40 for a residence with a service entrance of more than 225 amps.

SRP has one charge that is not part of base rates, and that is the Fuel and Purchased Power Adjustment Mechanism, or FPPAM. SRP recovers the costs of fuel and purchased power (including natural gas; solar, wind, and storage purchase agreements; and market purchases used to help maintain energy reliability) through a separate component of a customer's monthly bill based on energy usage, allowing for a direct pass through of those costs. Because fuel and purchased power costs fluctuate often, the Fuel and Purchased Power Adjustment Mechanism (FPPAM) allows for periodic price adjustments to ensure timely recovery of those costs.

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## Name: Jared Gilmore

**Record Number:** d2e5f857  
**Delivery Method:** Digital Submission  
**Received Date:** 12/15/2024

**Comment:**

I am still disappointed the power utilities went away from net metering for solar equipped customers. Time of use market rate should be the foundation for an equalized compensation and cost field. Let the unadulterated economics dictate policy and technological adaptations. In a state with unsurpassed solar advantages it is a shame to be restricting or hindering the utilization of such a resource with false economies. Aside from the disappointing support for solar, I have to comment on the question I have surrounding the MSC. I have had maybe two or three service calls to my properties ever, I don't interact with customer service, my billing is direct billed and automated and my grid connection (as far as I can follow the ancient poles in my neighborhood) might be original to the development of Tempe... 1950's???? Please do a better job with transparency around what your "service charge" increases are actually doing and why.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #d2e5f857

**Response:**

Hi Jared,

Thanks for reaching out. I'll respond in order of your comments and questions.

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).

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 (to be updated each year), which is based on a three-year average of the real-time market prices for energy.

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.

The distribution system portion of the MSC covers more than simply distribution poles, it covers everything from the substation to your house. This includes the transformers that need to be replaced every few decades.

SRP does not charge customers directly for customer service calls or emails. This cost is recovered through the MSC of all customers.

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## Name: Theresa Sella

**Record Number:** f7dfacad  
**Delivery Method:** Digital Submission  
**Received Date:** 12/23/2024

**Comment:**

Can you please explain these changes in layman terms? According to this, the peak time frame is 6pm to 9pm. Today it is 3pm to 6pm. Is this an accurate take away? Your explanations are confusing and do not make sense.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #f7dfacad

**Response:**

Hi Theresa,

Thank you for your question. Currently, residential non-solar customers have several price plans to choose from with different on-peak hours.

- SRP EZ-3 Price Plan: On-peak hours from either 3 to 6 p.m. or 4 to 7 p.m. on weekdays, year-round (excluding observed holidays).
- SRP Time-of-Use Price Plan: Winter On-peak hours from 5 a.m. to 9 a.m. and 5 p.m. to 9 p.m. on weekdays (excluding observed holidays), and Summer On-peak hours from 2 p.m. to 8 p.m. on weekdays (excluding observed holidays).
- SRP Residential Demand Price Plan Pilot: Winter On-peak hours from 5 a.m. to 9 a.m. and 5 p.m. to 9 p.m. on weekdays, and Summer On-peak hours from 2 p.m. to 8 p.m. on weekdays (excluding observed holidays).
- SRP Electric Vehicle Price Plan: Winter On-peak hours from 5 a.m. to 9 a.m. and 5 p.m. to 9 p.m. on weekdays, and Summer On-peak hours from 2 p.m. to 8 p.m. on weekdays (excluding observed holidays).

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). The on-peak hours for the two new proposed TOU price plans are as follows:

- E-16 Demand Price Plan for Residential Time-of-Use Service: On-Peak hours from 5-10 p.m. on weekdays, year-round (excluding observed holidays).
- E-28 Pilot Price Plan for Residential Time-of-Day Service with Super Off-

Peak Hours: 6 to 9 p.m. on weekdays, year-round (excluding observed holidays).

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## Name: Sarah B

**Record Number:** 53ca5a9e  
**Delivery Method:** Digital Submission  
**Received Date:** 12/26/2024

**Comment:**

SRP says the Board makes pricing decisions based on equity i.e. customers should pay their fair share of costs SRP incurs on their behalf. How is it equitable when SRP gives away FREE EV charging to EV owners at the Phoenix Zoo, while making all other customers pay for that perk provided to those already well off?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #53ca5a9e

**Response:**

Hi Sarah,

Thank you for your question and for engaging with us on this important topic.

The installation of electric vehicle (EV) charging stations at the Phoenix Zoo is part of a research project aimed at better understanding EV charging behaviors at public locations; the alignment of charging energy (kWh) and power demands (kW) with the solar energy generated by the panels installed overhead; and the impact on the visitor's length of stay at the public location. This research is crucial as it allows SRP to gather data and insights that will help us develop effective programs and pricing strategies in the future.

While it may seem that the project benefits only a select group, the relatively small cost of this research project is an investment in our collective future. By conducting this research now, while EV adoption is still in its early stages, SRP can provide guidance to customers and the EV industry for infrastructure investments and develop pricing and programs that shape EV charging behaviors to minimize the impact on SRP's system. This proactive approach is beneficial for all customers, as it will help SRP utilize existing infrastructure more efficiently and prevent potential upgrade costs that may impact customers down the road.

Additionally, this project aligns with SRP's 2035 Sustainability Goals, which include encouraging the adoption of EVs and managing charging in a way that supports SRP's overall sustainability efforts. By understanding and optimizing EV charging behaviors, SRP can better integrate renewable energy sources and ensure a more sustainable and equitable energy future for everyone.

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**Name: Alan W. Wilson**

**Record Number:** 6fff3b89  
**Delivery Method:** Digital Submission  
**Received Date:** 12/28/2024

**Comment:**

Does SRP impose any additional fees on new developments that result in the need for additional power and water use? It seems those new developments that require an increase in infrastructure power grid capacity and demand for additional water should be charged additional fees to help cover the additional costs associated with increasing capacity. Thank you, Alan W. Wilson

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #6fff3b89

**Response:**

Hi Alan,

For new developments that require increased infrastructure for power and water use, SRP requires the developer to contribute to the costs associated with expanding capacity to meet the demands of the new developments. For power, SRP charges for construction based on the specific services requested, such as new residential and commercial electric service, temporary electric service, and upgrades to existing services. For water, developers must submit their plans through the SRP Plan Portal for review and issuance of a construction license. There are fees associated with this process, including licensing fees for projects that involve SRP irrigation facilities. These contributions and fees ensure that the costs of expanding infrastructure are appropriately borne by those who directly benefit from the expansion, helping to maintain a sustainable and efficient system. It is important to note that beyond capacity investments, the price proposal reflects the costs of investments in grid infrastructure which benefit both new and existing customers.

Thank you for your question and your interest in SRP.

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## Name: David Carlson

**Record Number:** 19a5ecbf  
**Delivery Method:** Digital Submission  
**Received Date:** 12/29/2024

**Comment:**

Please explain "average of daily on-peak kW" for E-16 and E-28. It is also phrased as "average of the daily on-peak maximum demand." Since this says kW, I assume this means that the 30-minute peak kW usage during the on-peak period for each day of the month is determined and then the average of these values is calculated. But, no mention of the 30-minute period is included, unlike current plans. So, how is it really calculated? This should be carefully explained to everyone who reads these plans. It also says "The mechanics of this price plan allow customers to manage their on-peak maximum demand on a daily basis." How do you expect customers to do this?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #19a5ecbf

**Response:**

Hi David,

Thank you for reaching out.

The proposed E-28 price plan does not have a demand charge. The proposed E-16 price plan has an average on-peak demand charge. Here is the language from Appendix A from the price proposal:

"The billing demand, in each billing cycle, is the average of the daily maximum thirty-minute integrated kW demands occurring during the on-peak periods of that billing cycle, as measured by the meter."

To determine the billed kW for the demand charge under E-16, one would take the max of any 30-minute period between 5 PM and 10 PM on days that have on-peak periods (no weekends or SRP holidays), then average that for the billing cycle.

Here is a link to Appendix A, which lists the full prices and structures of the proposed price plans:

[Appendix A to Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\) – Proposed Standard Electric Price Plans and Riders](#)

# SRP Public Price Process Responses from: 1/17/2025

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## **Name: Valerie Andrews**

**Record Number:** f0d96405  
**Delivery Method:** Digital Submission  
**Received Date:** 12/12/2024

### **Comment:**

I would have like to been able to participate in SRP Residential Demand Price Plan Pilot. It would be nice if there was a way to compare my data across all the available plans offered to view how price varies based on what was used to determine the best plan to use. For example: I paid x amount of dollars on the time of use plan. I could've paid x amount of dollars using standard plan, SRP Daytime Saver Pilot, EZ-3, etc. Would like to see the breakdown of all the plans side by side. With all of the variances and fees, it makes it difficult to decide on anything beneficial. I appreciate your time. Thank you.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #f0d96405

### **Response:**

Hi Valerie,

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

For a side by side comparison of price plans, please refer to SRP's website: <https://www.srpnet.com/price-plans/residential-electric/compare-plans>

This link gives more info specifically about Time of Use (TOU) plans, and includes a risk free guarantee, which allows you to switch back to the basic rate if you ended up paying more money on a TOU plan. <https://www.srpnet.com/price-plans/residential-electric/time-of-day-plans-savings>

For assistance in choosing a price plan, you may call SRP's Customer Service department at (602) 236-8888.

If approved, customers will have a chance to participate in a residential demand price plan, similar to the E-27P price plan that you mentioned. The proposal includes two new 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.

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**Name: Kiera Monet**

**Record Number:** MI6772979  
**Delivery Method:** Email to Corporate Secretary  
**Received Date:** 12/20/2024  
**Attachments:** 20241220\_PriceProcess\_Comment\_Email\_KieraMon  
et.pdf

*\*To receive a copy of Attachments please  
contact the Corporate Secretary's Office and Reference  
Record #MI6772979*

**Comment:**

Good Morning,

I am emailing in regard to some electric/utility questions.

We are a small company that has a collation partnership with a data center in phoenix and we were recently notified of a price increase.

I was wondering if there was a way that we could obtain a record or report of some kind that shows the average utility rates/pricing from September 2023 to present for Pheonix AZ?

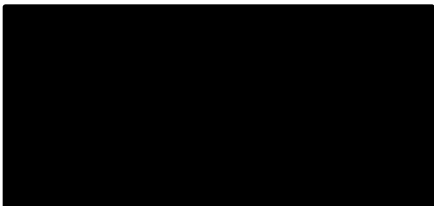
Thank you,

Kiera

***Kiera Monet***

***Business Operations Manager***

**Bunker Information Technology, Inc.**





[REDACTED]  
"Don't put off tomorrow, what you can do today"-Ben Franklin

**P** Is it necessary to print this document?  
**ü Please consider the environment before printing this email**

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #MI6772979

**Response Attachments:** SRP vs APS Comparison Sept 2023 thru Sept 2024.pdf;

*\*To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #MI6772979*

**Response:**

Hi Kiera,

Thank you for your question.

Attached is a table showing the average electric prices per kWh across all customer classes (residential, commercial, industrial, etc.) from September 2023 through September 2024, for SRP and Arizona Public Service (APS).

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## Name: Paul Jobs

**Record Number:** 10c73f26  
**Delivery Method:** Digital Submission  
**Received Date:** 12/22/2024  
**Comment:**

What if are on the budget plan? Can we stay on our current plan?

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**Response Subject:** SRP Corporate Pricing Response to Public Comment  
#10c73f26

**Response:**

Hello Paul,

There are no changes proposed for the Budget Billing program at this time

However, SRP is freezing certain residential plans from new customer participation, which does include the SRP EZ-3 Price Plan™ (E-21 and E-22). In place of the frozen price plans, SRP is introducing 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. We encourage customers to try out one of our new price plan offerings, with the reassurance you can move back to your original frozen price plan if aren't satisfied and will be able to remain on it until it's eliminated no later than November 2029.

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 [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#).

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# SRP Public Price Process Responses from: 1/18/2025

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**Name: David Vernon**

**Record Number:** c47d8bca  
**Delivery Method:** Digital Submission  
**Received Date:** 12/12/2024

**Comment:**

Hello, I am reading through the proposed rate adjustments and have a question: How many megawatt hours of electricity were used by residential SRP customers over the past 12 months? Thank you for your prompt reply, David Vernon

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #c47d8bca

**Response:**

Hi David,

Thank you for reaching out. From October 2023 to September 2024, SRP's residential customers used 15,226,115 MWh of electricity.

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**Name: saulb sadowsky**

**Record Number:** b4b35fc7  
**Delivery Method:** Digital Submission  
**Received Date:** 12/19/2024

**Comment:**

Why are customers with solar being unjustly charged more. ?? You're giving less incentives for people to get solar than ever before. The ROI isn't even in the works with your lame plans. SRP has invested in hundreds of MW of solar over the last 5 years and yet being the cheapest cost to SRP, you again raise the prices, so we consumers can pay for that capital infrastructure. you call it keeping up with an aging infrastructure, I argue that point. Where are the incentives to go solar???

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #b4b35fc7

**Response:**

Saulb Sadowsky,

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.

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 (to be updated each year), which is based on a three-year average of the real-time market prices for energy.

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.

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## Name: Gayle Savo

**Record Number:** 43589116  
**Delivery Method:** Digital Submission  
**Received Date:** 12/23/2024

**Comment:**

Before entering into conversation regarding price increases, I would like to know how much revenue SRP has received from the monthly service charge. It's been in effect for years and years. I also would like to know what it was initially intended for, what it has actually been used for, how long it will be in effect. Also, does SRP have a "no frills" budget. As a utility, consumers have no choice as to who they use.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #43589116

**Response:**

Hi Gayle,

Thanks for the questions.

For SRP's fiscal year 2024 the total revenue for residential customers was about \$1.87 billion. Out of that, approximately \$256 million was from the monthly service charge, resulting in about 14% of residential revenues coming from the monthly service charge.

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. SRP has had an MSC for decades as you've noted.

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.

Addressing your question about a "no frills" budget: 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 cost-effective 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.

Additionally, as financial market opportunities arise, SRP refinances debt at lower interest rates to lower overall interest expense. Over \$2.6 billion of revenue bonds have been refinanced since May 2015, with another \$300 million scheduled to be refinanced in 2025. The finalized refinancing transactions achieve net present value interest savings in excess of \$18 million per year, on average, from Fiscal Year 2015 through Fiscal Year 2038.

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**Name: Teresa Orozco**

**Record Number:** 9ece5108  
**Delivery Method:** Digital Submission  
**Received Date:** 12/30/2024

**Comment:**

Why is the increase higher for residential homes with solar panels? I thought SRP was promoting saving energy and the environment. Homeowners have made the financial decision and effort to go solar but getting charged more for using power from SRP??

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #9ece5108

**Response:**

Teresa Orozco,

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.

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 (to be updated each year), which is based on a three-year average of the real-time market prices for energy.

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## Name: Rosemary Cyr

**Record Number:** 8c583c32  
**Delivery Method:** Digital Submission  
**Received Date:** 12/31/2024

**Comment:**

When we leave for the summer from May to November, we turn off all power. What will the new rate be? It seems we already pay enough and use no power at all already.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #8c583c32

**Response:**

Hi Rosemary,

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

If there are months with no usage, the bill should consist only of the Monthly Service Charge (MSC).

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.

This proposed change to the MSC is factored into the average residential bill increase of \$5.61.

For more specific information related to proposed changes to the MSC, please visit this webpage (which includes a link to a PDF with even more detailed information): [Proposed changes to residential price plans | SRP](#)

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**Name: Nathan Schaner**

**Record Number:** 9f41c103  
**Delivery Method:** Digital Submission  
**Received Date:** 1/1/2025

**Comment:**

Why do solar customers see a higher increase when compared to non solar customers every time there is a price change? The most recent price change had a higher average impact and now does this one. This is discriminatory and sends a message that alternative sources of energy are discouraged by SRP. When customers commit to a solar system, it's long term, and seeing prices changes that affect solar customers more than non solar customers is a complete rug pull.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #9f41c103

**Response:**

Nathan Schaner,

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. Note that under the most recent price change (the November 2024 increase to the Fuel and Purchased Power price), the average increase for residential solar customers was lower than the average increase for residential customers without solar. Under SRP management's proposal for November 2025, 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 (to be updated each year), which is based on a three-year average of the real-time market prices for energy.

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## Name: Cindy Barnes

**Record Number:** d398f728  
**Delivery Method:** Digital Submission  
**Received Date:** 1/2/2025

**Comment:**

Can you tell me what your plan is on weekends for Time of Use? It sounds like it's 8 am to 3 pm daily when currently weekends and major holidays are off peak. I have been on the time of use for years and we leave in summer and set our AC to 85 and still have \$285.00 bill..I really feel like Srp has been raising their fees a lot in last few years. Wish the board was not doing this.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #d398f728

**Response:**

Hi Cindy,

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

SRP management is proposing to freeze new participation in, and eventually eliminate, the current Time-of-Use (TOU) price plans as part of the effort to simplify SRP's portfolio of residential price plans. 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. This low-cost, super off-peak period will apply every day of the year, including weekends and holidays. Both new price plans include on-peak hours where energy is more expensive; one plan (E-28) has an on-peak period from 6 – 9 p.m. and the other (E-16) has an on-peak period from 5 – 10 p.m., with an average demand charge. The on-peak hours for both price plans only apply to weekdays, excluding 6 holidays. All hours that aren't super off-peak or on-peak are considered off-peak hours.

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## Name: Vikram Shah

**Record Number:** 925e1c7a  
**Delivery Method:** Digital Submission  
**Received Date:** 1/4/2025

**Comment:**

I am on TOD plan. How is it changing. Also super off peak plan for EV charging staying or being done away. Also what are KWH charges at different time of day. Love SRP, it is a great utility company being a customer for pas 40 years.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #925e1c7a

**Response:**

Hi Vikram,

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

SRP management is proposing to freeze new participation in, and eventually eliminate, the current Time-of-Use (TOU) price plans as part of the effort to simplify SRP's portfolio of residential price plans, while introducing two residential price plans (E-16 and E-28) with super off-peak periods from 8 a.m. to 3 p.m. Customers participating in one of those price plans can save money and help the grid by reducing demand during on-peak periods (5 p.m. to 10 p.m. under E-16 and 6 p.m. to 9 p.m. under E-28).

The current EV overnight super off-peak TOU periods are proposed to be frozen from new participation in November 2025, and the new price plans (E-16 and E-28) will have super off-peak periods from 8 a.m. to 3 p.m. instead. This is because 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.

Weekends and 6 holidays will still be super off-peak (from 8 a.m. to 3 p.m.) or off-peak.

For more details on the pricing proposal, please visit [Proposed Adjustments to SRP's Standard Electric Price Plans Effective with the November 2025 Billing Cycle \(Amended and Restated\)](#).

Thank you for being a customer these past 40 years!

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## Name: Brandyn Barton

**Record Number:** 48852d50  
**Delivery Method:** Digital Submission  
**Received Date:** 1/7/2025

**Comment:**

What is SRP doing with the existing funds they have received from the price increase that occurred within the last few years? Why is there now a requirement to increase the prices again? Is the money being put into the grid and ensuring power is available and supplied without interruption at any point throughout the year, most importantly during the peak of summer? In my neighborhood and area there were handedly close to 6 outages within a few week span during the peak of summer. Yet when contacted SRP said the power kept going out due to the heat in Arizona. Unless there is a clear plan and proper use of the funds to enhance the grid and power services, I will be ensuring the corporate commission is reviewing this increase proposal as it is unwarranted given the increase that has already been levied. Increases are understandable when there is proper usage of the funds and we as the consumers can see the difference, but as of yet, I haven't seen that.

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**Response Subject:** SRP Corporate Pricing Response to Public Comment #48852d50

**Response:**

Brandyn,

In response to your questions:

What is SRP doing with the existing funds they have received from the price increase that occurred within the last few years?

- SRP last conducted a pricing process in 2019. On March 25, 2019, the SRP Board of Directors approved an overall average annual price decrease of 2.2% that took effect on the May 2019 billing cycle.
- Unrelated to a pricing process, SRP's publicly elected Board of Directors recently approved an adjustment to the Fuel and Purchased Power Adjustment Mechanism (FPPAM) rate that resulted in an overall 3.9% increase, effective Nov. 1, 2024. SRP recovers the costs of fuel and purchased power (including natural gas; solar, wind, and storage purchase agreements; and market purchases used to help maintain energy reliability) through a separate component of a customer's monthly bill based on energy usage, allowing for a direct pass through of those costs.
- Other pricing adjustments may be perceived because energy prices are

seasonal and change throughout the year.

Why is there now a requirement to increase the prices again? Is the money being put into the grid and ensuring power is available and supplied without interruption at any point throughout the year, most importantly during the peak of summer?

- 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.
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