

SRP Price Process Comments week ending February 1, 2025

SRP Public Price Process

Comments from: 1/26/2025

Name: David Bender

Record Number: f49b5566

Delivery Method: Digital Submission

Comment:

This fourth set of questions continues numbering from three prior sets previously submitted. 22. Please produce the data required by 18 C.F.R. 292.302(b)(1)-(3) for the most recent six years. Because such data are required “not less often than every two years,” the response to this request should include at least three separate sets of estimated avoided costs for energy, plans for capacity additions, and estimated capacity costs at completion. To the extent that you contend, pursuant to 18 C.F.R. 292.302(d)(1), that “data different than those which are otherwise required” by 18 C.F.R. 292.302 can be used to derive avoided costs, please (a) identify and produce the “different data” that you contend can be used to derive avoided costs, and (b) produce a copy of your notification(s) to FERC pursuant to 18 C.F.R. 292.302(d)(2). 23. Please state whether SRP has ever dispatched generation, or received energy pursuant to a bilateral agreement, at a cost to SRP that exceeds the simultaneous CAISO Western Energy Imbalance Market Load Aggregation Point for SPR (ELPA) price for energy. This includes, but is not limited to, instances when the fuel cost and variable operation and maintenance cost of a generating resource exceed the ELPA price for the generation from that resource. If such events occurred in the most recent five (5) years, identify each such event, separately by hour and generation source, and for each such event also identify (a) the cost to SRP for the energy generated or procured and (b) the ELAP price for energy in that hour. 24. Reference the QF-24 Standard Rate for Qualifying Facilities Under 18 CFR 292.304(c) (which is linked on this page). Please explain the basis for SRP's conclusion that “As of the time of publication of this QF-24 Standard Rate, the Capacity Cost Adjuster is \$0.” This includes, but is not limited to, SRP's existing capacity resources, planned and expected capacity additions, and projected capacity requirements for the next five (5) years or longer if projections beyond five (5) years have been made, and for each capacity resource identified, the overnight cost of the resource when added in dollars per kilowatt and the annual carrying cost of the resource in dollars per kilowatt-year.

SRP Public Price Process

Comments from: 1/27/2025

Name: Katie Muller

Record Number: c88f3e0d

Delivery Method: Digital Submission

Comment:

Dear Sir or Madam, I am writing to express my concern about the current practice of using customer revenue for charitable donations. As a non-profit monopoly, I believe you have a responsibility to charge customers only for the necessary costs of maintaining power service. While I appreciate the challenges of managing power supply amidst rapid growth, I urge you to reconsider this policy. Allowing customers to retain their funds empowers them to support charities that align with their personal values. Thank you for your attention to this matter. Sincerely, Katie Muller

Name: Michael Pagel

Record Number: 13e5e8a9

Delivery Method: Digital Submission

Comment:

I installed solar 3 years ago and recognized the need for solar installations to pay for service and maintenance of the power grid. What I don't like is being charged the high Peak Demand charges based on a small time window and applied to the whole day. This is forcing me to look at battery backup so I can avoid those peak demand charges. I've read the website about how peak demand is calculated but I'm still confused and think us solar users are being gouged.

SRP Public Price Process

Comments from: 1/28/2025

Name: Shirley Shannon

Record Number: 85aff416

Delivery Method: Digital Submission

Comment:

SRP needs to have a reduced cost for seniors over the age of 70. We hardly get enough to live on let alone continue to pay higher prices for electricity. We can't be in a position that we have to choose if we want electricity or groceries.

Name: Matthew Hicks

Record Number: e722c553

Delivery Method: Digital Submission

Comment:

It is unclear on what the demand charge is for solar users. Could we be provided with more clarity on why this charge exist on the solar plans and what the charge goes towards?

Name: Jan Reynolds

Record Number: b9c81552

Delivery Method: Digital Submission

Comment:

I have planted trees and shrubs in my front, sides, and back yards. There is no more space to plant. Still, my bills are ridiculously high. I keep my heat at 69 or 70 degrees at most and shut off electric devices from 3-6. I am 70 years old and live in a mobile home park. These increases are obscene. Someone is making a killing at our expense and another rate is just enraging. Prices are incredibly high and now we have a regime in the white house that wants to increase our taxes through his stupidity. This all makes me sick and disgusted.

Name: G. Dybwad

Record Number: aeaf5261

Delivery Method: Digital Submission

Comment:

SRP: Please explain why homes with solar will receive a much higher cost increase than homes without. Why penalize solar? We send extra power to SRP on occasion and get little credit for it. G. Dybwad, Gold Canyon, AZ

Name: Byron Bopenhagen

Record Number: 44ad1c77

Delivery Method: Digital Submission

Comment:

The rates are getting worse and I'm handicapped so the high cost of electricity has caused me tremendous stress. I had my leg amputated I have a Pacemaker that needs to be constantly monitored. I personally feel that other handicapped people are experiencing the same stress that I have when forced with my electricity being shut off & I'm on a monthly fixed income. I wish rates could be reduced for disabled, handicapped Gilbert Residents. I'm in a wheelchair so I'm home most of the time so the thoughts of rate increases make my situation feel even more hopeless.

Name: Felecia Zahn

Record Number: 225e6548

Delivery Method: Digital Submission

Comment:

There should not be any increase in price for the next year 2025. There should not be a higher price for solar customers. The monopoly creates unfair price gouging.

Name: Jere Wesley Planck Jr

Record Number: 7a2ad037

Delivery Method: Digital Submission

Comment:

This is without a doubt some of the dumbest suggestions I have seen. Our electrical bill has already skyrocketed over the past years and you don't even mention what the new pricing is on the new TOU plans. You're raising the base service fee cost, which completely defeats the purpose of lowering energy bills, as you are just making the money back through that. You make going to Solar a joke, because the TOU solar plan sucks and you have a ridiculous base fee to where I can never offset my cost ever. Even if I offset my cost with solar you still have me pay over \$40mo. Be more solar friendly with higher incentives and stop gouging people with the price per kWh and maybe customers would be happier. Your monopoly sucks and you all can do better. Please revise these price changes and lower the cost of electricity for all of us here in Arizona. You know we are all forced in the summer to run AC because of the heat and keeping our homes at 85 is completely unrealistic.

SRP Public Price Process

Comments from: 1/29/2025

Name: Julie Imani

Record Number: d7643849

Delivery Method: Digital Submission

Comment:

I recently purchased a home with solar panels (owned). I should not have to pay a higher monthly service charge and be faced with more restrictions than traditional customers. There is no real option to avoid the demand charge where traditional customers have multiple plan options with no demand charge. Summer on-peak hours from 2:00 PM - 8:00 PM essentially force solar customers to use energy on-peak. This long window prohibits effective super-cooling or other energy-shifting practices. There is no solar option for a basic plan where I can pay the same charge without worrying about on- and off-peak use like traditional customers have. SRP should be encouraging solar power however these pricing practices disincentivize solar use. SRP claims to promote equity, everyone paying their fair share. However, solar customers who have paid thousands for solar panels are paying more than their fair share to SRP through higher MSC, forced demand charges, and more restrictive plan choices. It is clear SRP discourages solar energy as it would ultimately lower their profits so they create additional fees and create plans in which solar customers are paying more than they should. SRP's elected board needs to place energy conservation efforts above corporate profits and expand solar and other alternative forms of power, not penalize those using it.

Name: Gloria Williams

Record Number: 81931e2a

Delivery Method: Digital Submission

Comment:

No more price hikes! This is ridiculous, people all over AZ are having a difficult time making ends meet and this will just be another issue and for what? Greed! Maybe a petition needs to be set up to remove SRP from being allowed to monopolize energy!

Name: Margaret Burt

Record Number: ec13b30b

Delivery Method: Digital Submission

Comment:

I understand and respect what the Board wants to do, trying to help everyone using SRP. But as a recent adoptee of solar energy, while also still utilizing SRP every month, I am concerned about the proposed changes and how they would affect my family, older solar owners, and anyone else who might want to invest in clean energy. Reducing the value of daytime solar production undermines the effectiveness of solar systems, discouraging clean energy investments that benefit all SRP customers. Additionally, penalizing newer solar customers with limited grandfathering protections feels deeply unfair. These changes do not align with SRP's stated commitment to sustainability. I believe we must prioritize solutions that support solar adoption, protect the environment, and maintain fairness for all customers. Please reconsider these changes and stand with customers like me who are working toward a cleaner, more sustainable future.

Name: Kit Halloff

Record Number: f512a7e9

Delivery Method: Digital Submission

Comment:

There should be no increases. There should also be a sane price plan for solar users. I am paying more monthly with solar panels than I did before. We live in a state with a good majority of sunlight...it's insane what you charge as much as you do for solar clients.

Name: Sharon Casino

Record Number: MI6974461

Delivery Method: Email to Corporate Secretary

Attachments: 20250129_Comment_Casino.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI6974461*

Comment:

Dear **SRP Board Members**,

As an SRP customer and solar energy system owner, I am deeply concerned about the proposed changes to SRP's rate plan. These changes will negatively impact my household and others who have invested in clean energy solutions. We are helping **you** with the burden of electricity.

Specifically:

- **Time-of-Use Hours Shift:** Reducing the value of energy produced during daylight hours unfairly penalizes solar customers.
- **Unfair Grandfathering Policies:** Offering only four years of protection for newer solar customers, compared to 20 years for older customers, is inequitable.
- **Inconvenient Appliance Use Hours:** Shifting time-of-use schedules forces families to use appliances during inconvenient late-night hours.
- **Higher Demand Charges:** Increased charges erode the financial benefits of my solar system, discouraging clean energy adoption.

These changes contradict SRP's commitment to sustainability and fairness. I urge you to reconsider these proposals and work toward solutions that support solar customers and encourage renewable energy investment.

Thank you for your attention. I look forward to hearing SRP's plans to protect the interests of its customers and the environment.

Sincerely,

Sharon Casino

SRP Public Price Process

Comments from: 1/30/2025

Name: Greg Pinches

Record Number: 53969aa7

Delivery Method: Digital Submission

Comment:

As a senior on a fixed income, you are making it very hard to live during the summers. Having new air conditioners installed, we thought we would save some money, but with your price increases over the years and the average temperature constantly increasing we are having trouble trying to be comfortable. We were gone three months during the summer. Shutting off our air conditioners completely during that time and we paid more last year than the year before. We could not believe that was possible we are on the budget plan and we went from \$142 a month to \$167 a month this year. When we are home, we have to air condition our house to 84°. I guess this summer when we're home we will have to increase the temperature to 86° and sit in front of a fan using water to try to keep our body temperature down. It's very sad and not what we thought retirement would be like. Sincerely, Gregory Pinches.

Name: Kevin Dressler

Record Number: 5dec0ba4

Delivery Method: Digital Submission

Comment:

The price increase for residential solar customers is a terrible decision for a variety of reasons: 1) The burden of purchasing or leasing a solar system has already been accepted by the solar customer. The financial burden of SRP using surplus solar from these residents is minimal. 2) SRP claiming that power opportunities are diminishing from other traditional sources doesn't justify adding additional financial burdens on solar users as these solar users are part of the solution for SRP's challenge of identifying more energy opportunities. 3) Therefore, what the solar customer is left with is this: every large company really wants a monopoly. A cornered market is one that is easier to manipulate, control and project future sales and use. And, that is SRP's ultimate goal: To monopolize on what they have, retain it, and disincentivize the proliferation of solar in AZ. The governing board should have a sense of shame right now as the current pricing proposal strikes right at those reducing SRP's burden of securing more energy sources to meet the needs of AZ. Instead, the board is fooling themselves that that they are making a sound business decision, when reality shows they are targeting and harming their very customers that are helping SRP into a new, more sustainable future. Sincerely, Kevin Dressler 40 year SRP Customer

Name: Brendon Becker

Record Number: MI6978582

Delivery Method: Email to Corporate Secretary

Attachments: Proposed Solar Changes 1 31 2025.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI6978582*

Comment:

Dear SRP Board Members,

My name is Brendon Becker, and I am a longtime SRP customer who eight months ago invested in solar energy to reduce my family's energy costs and contribute to a cleaner future. I am writing to express my strong opposition to the proposed rate plan changes, which will negatively impact solar customers like myself.

The shift in time-of-use hours severely diminishes the value of solar energy during the day when my system is most productive. Limiting grandfathering protections for newer customers is extremely unfair, penalizing those of us who recently chose to go solar. Not to mention the fact that you are gaining the power my system is producing and paying next to nothing for it.

These proposed rate changes threaten the value of my substantial investment and the progress we've made toward sustainable energy in Arizona. Adoption of the proposed changes discourages clean energy adoption and harms families who have worked hard to make environmentally responsible choices. I hope SRP will reconsider these proposals and protect customers like me who have invested in a better future for our community.

Sincerely,

Brendon Becker

Name: Steve Neil

Record Number: 6856ca4f

Delivery Method: Digital Submission

Comment:

Thank you for the response to my inquiry you have coded as 7b6b6359 about the "Per Exported kWh Credit". In your response, I learned that you only count the exported kWh on the E-13 and E-14 plans. 1. I recognize that E-15 and E-27 are monthly net metering type plans and grandfathered solar is likely on a annual net metering basis and their exported kWh data may not be as readily available as it is for E-13 and E-14, but your meter experts told me that your L&G meters track kWh Received in the meter's interval data which means you have the data. If that understanding is incorrect, please send all the details about why as in meter make and model, programming, etc. 2. So, unless the data does not exist, this request is to provide the same spreadsheet "Export Rate Calculation (Corrected with ELAP) (3.45).xlsx" but with additional columns for each of the following exporting customer groups: 1. E-15 2. E-27 3. grandfathered solar customers on any other plan other than the already counted customers on the E-13 & E-14, E-15, E-27 columns. 4. A column summing all 4 columns (or I can add myself but you might as well add it so you see what I'm going to see.) I suggest that you base the data on the customer's current plan and disregard whether the customer changed plans during the timeframe.

Name: Fred Flores

Record Number: e40a2c8d

Delivery Method: Digital Submission

Comment:

Any increase in rates via SRP is detrimental. ITT impacts people monetary wise on a monthly basis. The impact on folks with solar panels on their is even more devastating, getting punished for going green. SRP and APS are going to drive people away from this State with their ongoing greed to raise rates. These rate hikes are making me to consider moving to a state like Oregon. Rethink your rate hikes..

Name: Barb Mohr

Record Number: d6b012a1

Delivery Method: Digital Submission

Comment:

I am a 77 year old senior and I would really have a hard time having a price increase. I am on a fixed income and there is only so much I can pay. When I first came to AZ my budget amount for SRP was \$69 every month for a few years. It has gone up to \$101 a month now within 7 years! That's too much a month in only 7 years. I realize everything has a higher price tag on it these days, with not much more money coming into the home, it's very difficult!

Name: Thomas Leander

Record Number: 06e5e764

Delivery Method: Digital Submission

Comment:

I've built and used two rooftop solar systems in Arizona in the last 10 years, which has resulted in literally tons of CO2 being kept out of our air. My system and the many thousands of other residential systems are providing vast amounts of power to the grid, and preventing more investment in fossil fuel plants, and reducing CO2. We cannot afford to pay much higher rates, and excess fees for solar system owners is outrageous. Please stop contributing millions of dollars to political candidates and stock buybacks, and start considering working for the people of Arizona.

Name: JILL CARIDEO

Record Number: b69e4cb6

Delivery Method: Digital Submission

Comment:

As an SRP customer and solar energy system owner, I am deeply concerned about the proposed changes to SRP's rate plan. These changes will negatively impact my household and others who have invested in clean energy solutions. Specifically:
• Time-of-Use Hours Shift: Reducing the value of energy produced during daylight hours unfairly penalizes solar customers.
• Unfair Grandfathering Policies: Offering only four years of protection for newer solar customers, compared to 20 years for older customers, is inequitable.
• Inconvenient Appliance Use Hours: Shifting time-of-use schedules forces families to use appliances during inconvenient late-night hours.
• Higher Demand Charges: Increased charges erode the financial benefits of my solar system, discouraging clean energy adoption.

Name: Leslie Friedman

Record Number: fb535448

Delivery Method: Digital Submission

Comment:

I sure hope you have nothing to do with the solar panel homes in Surprise because I could never afford you! We invested in solar to save money as well as to help the planet ... certainly not to enrich greedy corporations. You should be ashamed!

SRP Public Price Process

Comments from: 1/31/2025

Name: Lee Gangl

Record Number: bc62d59e

Delivery Method: Digital Submission

Comment:

Should SRP consider reevaluating how residential solar electricity customers are charged and compensated? Prima facie, SRP plans and pricing favor non-solar power users. For example, SRP buy-back rate for excess solar power is around \$0.03. In contrast APS's buy back rate is nearly \$0.08. Additionally, the monthly connection rate is \$15 higher for SRP solar users. I understand there are extra costs for retrieving solar power from residents, but perhaps an option at a one time connection fee would make solar power savings more attractive month-to-month. If there were more incentives, then more residents would consider solar. And ultimately, that would decrease the demand on SRP, especially for those peak demand hours during the summer.

Name: Tyler Jenkins

Record Number: 794db5af

Delivery Method: Digital Submission

Comment:

I do not support any additional cost increases for power. Our homes are significantly more energy efficient than they were 20 years ago, yet the electrical companies keep finding ways to keep the prices going up. No increases.

Name: Tammy Bosse

Record Number: MI6987958

Delivery Method: Other

Attachments: 20250131_PublicComment_Bosse.pdf

**To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #MI6987958*

Comment:

Thank you, SRP, for your service. As a community utility, we appreciate that your commitment to best serving your customers and the community.

An essential part of that service is to encourage utility practices that are good for the economy and ecosystem. Clean energy is an essential component for both. SRP's utility plans have made SRP one of the worst utilities in the nation for solar. Since Arizona's sunshine is one of our greatest strengths, but air quality and increasing prolonged searing heat is one of our greatest challenges, it is imperative that utilities such as SRP lean in and SUPPORT clean energy, rather than have policies that are punitive to clean energy. Treating solar customers differently is a baseline discriminatory business practice.

Having a higher base fee for solar is discriminatory and destructive to our communities overall economic and livability wellbeing. Solar helps reduce the burden on SRP's generation capacity expenses. It helps the overall health and economic wellbeing of our community, which will help keep SRP's income growing, as well. It is a win/win for all.

SRP should be incorporating the opportunities with solar. The current buyback rates are horribly low and SRP benefits excessively with that. Even paying a fair buyback, the cost of this power is way less than with using dirty energy. SRP is unfairly taking advantage of solar customers and does not discuss this when talking about the "cost" of solar customers.

These proposed solar increases do not give credit to solar customers for relieving generation demand on SRP.

My QUESTION is will you specifically show how you factor in the cheap 2.4 cents rate that SRP pays for buyback when it is sold back to others at a much higher retail rate? This is not acknowledged when calculating the cost to deliver service to solar. Where is the credit for income generation for purchasing kWh at way less than what you sell it for? Is SRP fully incorporating the income opportunity with the electricity that solar generates

and gives back at a cost way below wholesale cost to SRP?

Why does SRP not incentivize battery use with solar customers?

My request is for SRP to incorporate the larger mission to best serve this community. Work with solar users to make it a win/win for all. If our heat is unbearable, if our air quality is so unhealthy that people do not want to live here, and our solar jobs are lost because of punitive solar plans, then we all lose out economically and with a livable quality of life here.

Thank you very much for considering these concerns and opportunities.

Tammy Bosse

Name: Michael Wright

Record Number: MI6988215

Delivery Method: Other

Attachments: 20250131_PublicComment_Wright.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI6988215*

Comment:

My concern is related to summertime peak usage. It seems to me like rooftop solar installations on housing should be encouraged as much as possible. Reducing the rates at which solar power is credited at does not support that goal. Rooftop solar is a distributed system and, I think, an important part of generating power during peak cooling season in the summer. My fears are concerning "brown outs" or even rolling blackouts should demand exceed supply. I know power can be imported from elsewhere but when it's hot here, its hot everywhere else around here!

Name: Sharon Harrington

Record Number: MI6989333

Delivery Method: Other

Attachments: 20250131_PublicComment_Sharon Harrington.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI6989333*

Comment:

APS Rate hike Feb. 22, 2024
Docket number E-01345A-22-0144
THE TRUE PRICE OF POWER

In 1957, the Price-Anderson Indemnity Act to put the responsibility on taxpayers to pay for any nuclear accidents, shielding the nuclear industry from their misdeeds and mishaps. Now APS asks for yet another rate hike, putting more burden on already-struggling households to further enrich their already massive profits. And our Corporation Commission listens to them and effectively shuts down the public response process by making it difficult to navigate and actually stopping people from making public comments either in person or by phone. APS should not be allowed this rate hike for very important reasons.

In 2023 hundreds of people died in Arizona because they could not afford to pay their electric bill or get their air conditioning fixed. Last time the process to make a public statement was unencumbered, people were allowed to phone in and get a recorded statement entered on the record. I called in to make a public comment last time and as I was waiting on line, I listened to the other callers before me. Elderly, poor, disabled and military families on fixed incomes begging for their lives that this rate increase did not get approved. They could not afford the bill already! It is immoral to grant APS this rate hike because it is killing people! APS should not be legally allowed to turn off anyone's electricity; it is equivalent to murder! Also for the most vulnerable of our society APS should have to forgive summer bill debt and absorb the cost. APS is asking for a 15% rate hike, they expect to get around 9.7%, That will add to the summer death toll significantly! If this Corporation Commission gives them this hike they will be complicit with murder.

APS already makes enormous profits. It is Double Taxation because of the Price Anderson Indemnity Act for APS to be granted this rate increase; they already get money through Price Anderson from our tax dollars for Palo Verde. APS privately owns the Palo Verde Nuclear Generating Station. In fact, all Nuclear power stations are privately owned in America and are covered under Price-Anderson. They should have to stand in the Free Market like every other privately owned company. In 1957 under the guise of the so called "Peaceful Atom" the government gave the Nuclear Industry our tax dollars to get insurance because they were too dangerous to insure by a private company! THEY WERE TOO DANGEROUS TO OPERATE IN CASE OF A NUCLEAR ACCIDENT! No other privately owned company could ever get tax dollars to operate because they are too dangerous - neither should Nuclear power companies. Palo Verde alone gets around \$100 million per year per reactor. Throughout this country the PRIVATELY OWNED NUCLEAR POWER Stations have been given Trillions of American tax payers' hard earned dollars! The Price-Anderson Act should be repealed. Americans should not have to pay the nuclear Industry's bills.

Nukes pose such outrageous danger to society in every phase of the nuclear fuel process. The uranium mined for these stations has caused the forced relocation of Native Americans from their ancestral lands. The whole Four Corners area has been turned into a National Sacrifice area since Price Anderson, and the cancer rates on and off the reservation have risen to the point where the average life expectancy for Native people in the Four Corners area is 47 years old. The Church Rock, New Mexico spill poisoned the Colorado River with a horrendous amount of Uranium Tailings contaminating the environment all throughout the cities right into everyone's drinking water. Even though President Joe Biden recently passed a bill stopping uranium mining on a million acres surrounding the Grand Canyon, The Nuclear Industry has done nothing to warn the public or clean up thousands of tons of the highly contaminated poisonous tailings they have already recklessly left all over the Four Corners Area. It is not good for the Tourists visiting the Grand Canyon because they are breathing in these tailings as they view the Canyon. At the John Wesley Powell memorial, Powell Point on the South Rim of the Grand Canyon, there are 1200 tons of Uranium tailings dumped right at Powell Point. Tourists are breathing it in as it blows in the air, exposing people to cancer when visiting Powell point and many other areas. It is ironic because Powell during his life time vigorously opposed the 1872 mining law, which is what the Nuclear Industry has used to contaminate the Four Corners so recklessly. Powell believed it would destroy the Canyon seeing the greed of the effects of the Gold Rush. He was so right but even he could not imagine what this new "Yellow Dirt" Gold would do. Tuba City has 800 tons of tailings, the 26,000 tons of radioactive waste under Lake Powell is another way Tourists are being exposed to cancer danger. There are over 500 abandoned

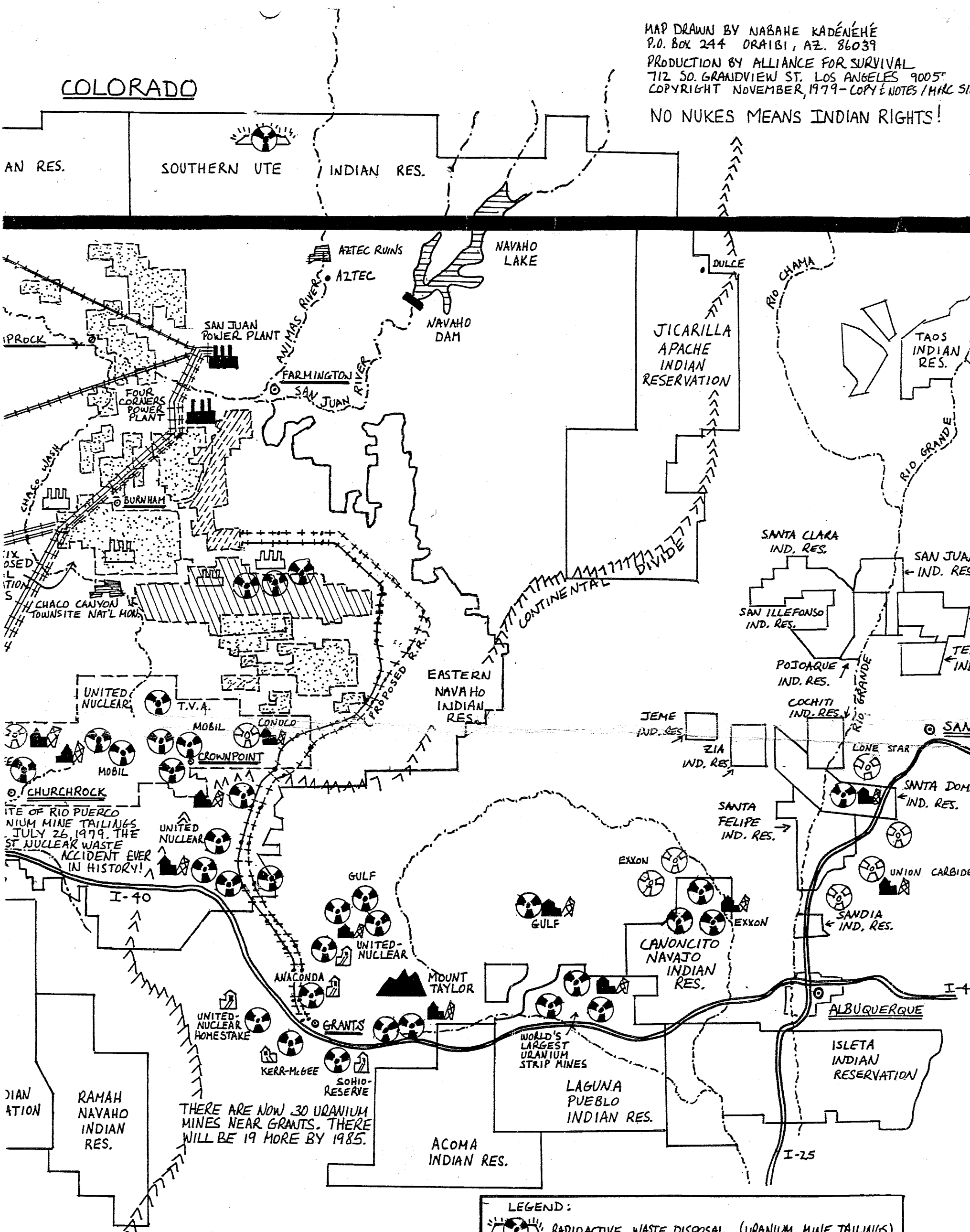
uranium mines on or near the Navajo Reservation. The Native people were never told this Yellow Dirt was highly poisonous and they built their homes with it. The families who live in those homes - including children - are constantly exposed to the radiation emitted by the walls surrounding them! It is immoral and negligent the way companies like United Nuclear and others have and continue to conduct their Privately owned business! They are a murderous Industry and should be forced to clean up and take accountability for what they have done. Our Government has to take action to force them to remediate contamination and health risks due to Uranium mining on Navajo Land and that of other tribes in the Four Corners region. Nuclear power is not a sustainable energy for the future; Uranium is finite just like coal and all Fossil Fuels that are causing Climate Change and killing our whole planet. Fossil Fuels steal our tax dollars and have a choke hold on the Department of Energy, never allowing any form of sustainable GREEN ENERGY, which can save our planet and reverse Climate change. No, APS absolutely does not deserve this or any other rate hike they will ask for in the future.

- Sharon Harrington

**See Map Attachment

MAP DRAWN BY NABAHE KADÉNIÉHÉ
 P.O. BOX 244 ORAIBI, AZ. 86039
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NEW MEXICO

U.S. THE B.I.A. ALLOWS MINERAL COMPANIES TO PAY INDIANS ONLY 20% PER EARTH. (STANDARD FEDERAL LEASES PAY 12% ROYALTIES. MONEY RATHER IS DIRECTED BY CORRUPT TRIBAL COUNCILS UNDER B.I.A. THE FOUR CORNERS AREA WILL BE A "NATIONAL SACRIFICE AREA", A PLACE WITH PERMANENT LOSS OF THE LAND WILL COME EXTINCTION OF MOTHER EARTH IS ESSENTIAL TO TRIBAL IDENTITY..... GENOCIDE. (M.S.)

80 FOUR CORNERS U.S.A.

LEGEND:

- RADIOACTIVE WASTE DISPOSAL (URANIUM MINE TAILINGS)
- URANIUM MINES - MILLS (EXISTING)
- URANIUM MINES - MILLS (PROPOSED)
- LEASED COAL DEPOSITS - FIELD
- COAL STRIP MINES (EXISTING)
- OIL & GAS LEASED AREAS
- RAILROADS
- TRANSMISSION LINE (EXISTING)
- TRANSMISSION LINE (PROPOSED)
- RIVERS & WASHES
- INTERSTATE HIGHWAY
- POWER PLANTS (EXISTING)
- (PROPOSED)

1" = 15 MILES

N ↑

Name: Nav Rajan (SunDial Solar)

Record Number: MI6990121

Delivery Method: Other

Attachments: 20250131_PublicComment_Rajan.pdf

**To receive a copy of Attachments please contact the Corporate Secretary's Office and Reference Record #MI6990121*

Comment:

****Comment Received via 1/31 Zoom Webinar Chat****

My name is Nav Rajan - I had to leave as the speaker time for the public went further than my schedule today unfortunately.

Tammy Bosse can speak on behalf of Sundial Solar and myself - I've been in solar for over ten years and watched different proposals like these get denied and also come to fruition. The current solar rate plans make it difficult for solar customers to save money while reducing stress on your grid. This is intentional to ensure SRP profits at all times of day and year -- Tammy is already touching on this

Name: Steve Neil

Record Number: 2d65bc63

Delivery Method: Digital Submission

Comment:

The 2019 pricing process Documents page at <https://srpnet.com/prices-priceprocess-2019-docs.aspx> had a link to the 2015 pricing process Documents page at <https://srpnet.com/prices-priceprocess-2015-pricingfaq.aspx> (slashes changed to dashes to satisfy your feedback submittal form's prohibition of slashes) (I note that you have changed some of these links over time and they redirect to altered pages, but still about the 2019 price process.) Wondering why the 2025 documents page does not have a link to the 2019 documents. Can you add it?

Name: Steve Neil

Record Number: MI6991513

Delivery Method: Other

Attachments: 20250131_PublicComment_Neil.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI6991513*

Comment:

*Flyer submitted at 1/31/2025 SRP Special District Board Price Process Meeting (See attached)

Let the customers' voices be heard.

Word cloud of the first ~1000 pages of customer comments received by SRP.

swear words redacted ;)

already bill bills cost costs customers
 electricity energy grid higher hours income
 increase oppose pay
 peak people plan please power price rate
 rates solar years

A much higher residential monthly service charge

- Biggest component of the overall price increase
- SRP wants a higher fixed charge on every bill to match their high fixed costs.
- Multi-family stays the same at \$20.
- Single-family detached up 50% to \$30, \$120 additional per year. (225 amps or smaller service)
- 400 amp+ services up 100% to \$40, \$240 more a year.
- Non-grandfathered solar (after 2015ish) customers will no longer be singled out for a higher service charge:
 - Multi-family dwellings (not many have rooftop solar) will drop from \$32.44 to \$20
 - Single family solar will drop from \$32.44 to \$30
 - 400A with solar will drop from \$45.44 to \$40
- Higher fixed charges discourage efficiency, conservation, solar generation, etc.

Price increase major driver is New Large Load Accounts

- Mainly data centers being built as part of the AI boom
- SRP says it has provisions to protect the rest of the customers from data centers that demand service and then don't pay for their share of the costs.
 - However, the financial safeguards can be waived by SRP management solely for "**expected job creation and other SRP economic development criteria**"!
- GM Jim Pratt said 1/30 that there are numerous pieces of infrastructure that are not in place to support this growth, notably natural gas pipeline supply being a major concern.

SRP has had about a billion dollars of income above expenses the past 6 fiscal years. Yet ...

- Long term debt has increased about a billion dollars
- And needs to charge customers more too?
- **Where did the billions go?** Have they explained that? Could belt-tightening like most consumers are doing be a compromise solution?

Phase out of all TOU and solar-only and EV plans

- Frozen from new signup by Nov 2025 bill.
- Sunsetting by Nov 2029 at the latest.
- **Phasing in 2 new time-of-use plans**, E-28 (straight time-of-use) and E-16 (average demand and TOU).
- There will be 13 plans then only 4 by Nov 2029.
- Then forced transition to one of the four plans below.
 - Basic flat rate called E-23
 - M-Power pre-purchase called E-24 and now the same pricing as Basic
 - TOU **6pm to 9pm M-F peak pricing** of 40c/kWh, called E-28, the new EZ-3, except near bedtime!
 - Averaged Demand (high half hour for each day averaged) with 5pm to 10pm M-F peak pricing called E-16
- The 4 plans are a good suite - flat rate, pre-pay, time-of-use, TOU with demand (and average of each day's peak which is much more consumer-friendly.)
- 4 plan choices is a good number. 4 is better than 1 and also better than 12!
- Solar export rate will be 3.45 cents, up 22% from the current 2.81 cents. Based on market prices now.
- Prices are reswizzled to better match costs, some up, some down, and overall up a little.
- Only 1/3 of SRP residential on TOU. Is 2/3 at APS! Why?

Peak pricing period is getting later and later in the day

- The market price is now highest around 7pm to 8pm summer weekdays and many other days too.
- Massive utility scale solar in SoCal, NV, AZ is the main driver to making power cheap up until 5 or 6 pm on summer days when it used to be the most expensive.

Low-income assistance expanded

- The income test is raised to 200% of the federal limit.
- Proposed to be only \$25 per month, barely covering the high monthly service charge.
- Mgt is open to a % discount like APS and TEP.

CONTINUED ON OTHER SIDE

Loss of Load Probability (LOLP) - the SRP pivot

- You probably won't hear too much about this in presentations to the board! Yet it is at the core.
- LOLP models how constrained the generation resources (and transmission resources too) and this measurement also generally corresponds with market pricing.
- SRP seems to have invented a new way to measure the Peak part of the common Peak and Average methodology that is used to determine pricing.
 - **They call it LOLP-Weighted Peak and LOLP-Weighted Net Peak.**
 - Google search finds nothing, except SRPnet.com
 - It roughly mirrors the old way of measuring peak called 4CP Peak (4 summer months highest) for all customer classes except for rooftop solar.
 - **Big question: Why is LOLP-Weighted Peak highest relative to 4CP Peak for the residential solar class?**
 - **This Peak part of the Peak and Average methodology is a major contributor to pricing.**
 - SRP has not fulfilled my information request, so I haven't been able to dig into this.

Basic Plan inclining block kWh pricing has been removed - all kWh cost the same. This removed a pricing signal that encouraged conservation.

No price plan cost comparison available to residential customers

- Despite the biggest need ever to find the most economical plan now which could be one of the many plans that will be frozen by November 2025.
- The existing plan cost comparison tool that was online and available to Customer Service was decommissioned in August 2024.
 - SRP has stated that it is not contemplated to be back in operation in some form for several years.
 - Reason given is because of changes to supporting information systems.
- The simple cost comparison on bills does not compare all available plans which is 8 for non-solar bills.
- Very complicated. 6 distinct on-peak pricing periods!
 - 3 to 6 pm for E-21
 - 4 to 7 pm for E-22
 - Summer half bills use 2 to 8 pm for E-13, E-14, E-15, E-26, E-27, E-27P, E-29
 - Winter half bills use 5 to 9 am, 5 to 9 pm for E-13, E-14, E-15, E-26, E-27, E-27P, E-29
 - 5 to 10 pm for the new E-16
 - 6 to 9 pm for the new E-28

- **Arizona's Consumer Fraud Act** considers omission of information key to the consumer making an informed decision to also be fraud.
 - **Big question: Why is SRP not informing their customers of the financial cost of the many plans they offer? How is a consumer to know?**
- APS and TEP offer extensive opportunities for customers to know their Most Economical Plan, with online tools, via customer service and on each bill.

Solar Export Rate aka Per Exported kWh Credit

- **3.45 cents per exported kWh**, up 22.7% from the current 2.81 cents
- They have stopped using what they pay for utility scale solar as the basis for compensating rooftop solar and have switched to all-source market prices.
 - No explanation given as to why. My info request for purchased solar prices has not been fulfilled.
- Recalculated every calendar year with a 3 year average of the hourly price from the CAISO ELAP_SRP-APND pricing information data.
- Weighted by hourly export data from the billing meters of E-13 and E-14 solar customers only, which is only 21,000 of the ~60,000 solar customers
- Is an hourly price unlike the grandfathered solar price which is the daily CAISO price.
- Compared to Arizona's regulated utilities:
 - APS 2025 rate of 6.85 cents, double the SRP rate.
 - TEP 2025 rate is 5.7 cents.
 - APS and TEP export rates don't change until the 11th year from solar system installation. SRP changes every year on a 3 year rolling average.
- Solar export plans to be frozen like E-13 & E-14 will stick at 3.45 cents until sunsetted in 2029 and will not be recalculated every year. Why not 1 export rate?
- The grandfathered solar annual excess kWh credit:
 - Is essentially unchanged
 - not the same as the Export Rate
 - Is calculated on the daily price, not the hourly price
 - Is not weighted by when the solar export occurred
 - Is May 1 to April 30, the fiscal year, not the calendar year like the Export Rate
- SRP does not price in any environmental benefits into the 3.45 cents figure, but they say they recognize the value of solar and will soon be proposing Solar Renewal Energy Certificate (SREC) compensation.

Name: Norm Sandler

Record Number: MI6993236

Delivery Method: Email to Corporate Secretary

Attachments: 20250131_PublicComment_Sandler.pdf; 01-31-2025
Board Meeting Handout Notes.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI6993236*

Comment:

The 2 minute time constraint did not permit a full presentation, but I think that point was made and understood.

There are really three types of costs:

- Embedded Costs
- Marginal Costs
- **Environmental Costs**

A number of the Board members requested copies of my presentation; would you please forward this handout.

Thanks and have a wonderful weekend,

Norm Sandler

****See Attachment****

SRP Board Presentation Notes

Opening Statements:

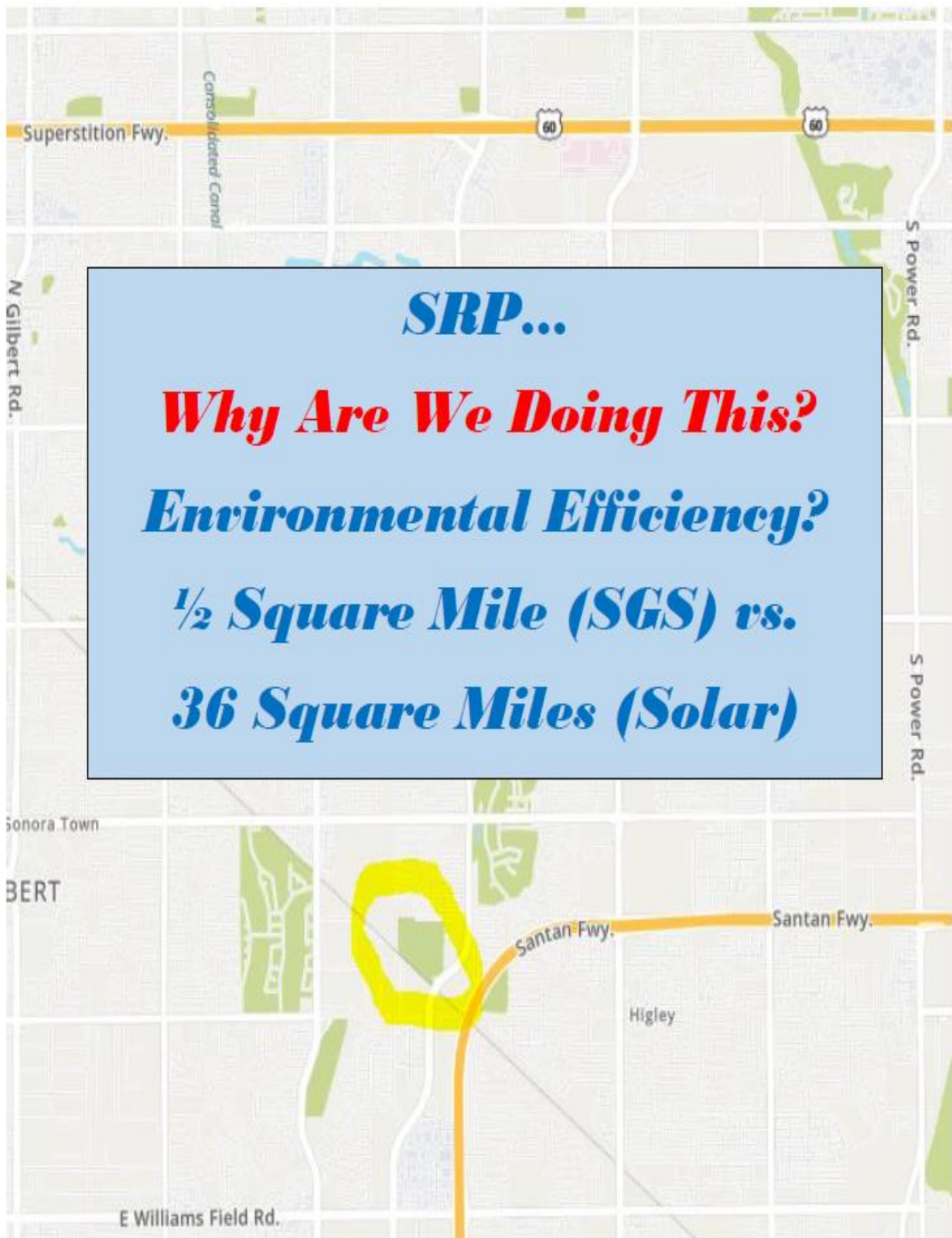
- SRP TOU Customer for 25 years; **Please Evergreen current TOU customers**
- SRP service provider for 33 years; here's a NGS Water Survey, 1992
- **Utilities have done a terrible job explaining to their customers how complicated it is to deliver safe, reliable, affordable electricity to their homes and the value it brings to human existence**
- Customers are spoiled; how many of us, during a rare outage, walk into a dark space & Flip The Switch? I have to chuckle to myself.
- Would like to introduce two new terms / tests to enter into the renewables mix;
 - o Environmental Efficiency
 - o Cultural Preservation
- Every new CapEx addition would need to be vetted / scored for its Environmental & Cultural Impacts...

SRP Facts...

- Let's start with the Santan Generating Station; are you familiar with that plant? SE Corner of Val Vista & Warner?
- Sits on 320 Acres, rated @ 1,415 MW ~(34,000 MWh) and services the immediate community
- Its Environmental Efficiency? *~106 MWh / acre Cultural Impact? Zero.*
- *SRP's Current Fossil Fleet* - (Fossil Fuels are naturally stored solar energy)
- `7,252 MW Fossil Fuel Generation
- Equates to ~174,000 MWh / Day
- Solar Land Equivalent (1.1 Acre / MWh) = ~ 175,000 Acres of Land (Ideal Conditions)
- ~ 275 Square Miles of Land
- *Equal to Almost 3X the amount of Land of ALL 35 of AZ State Parks*

Legislative Guidance...

- Net Carbon Neutral by 2050... How is that calculated? What's Included?
 - o Manufacturing, mining, construction, loss of land and CO2 Uptake, asset disposal, increased generation due to operational inefficiencies
 - o Free Money From Fed... monies we pay every year to the IRS? Really just hire rates to customers and more Debt on our children
- Net Neutrality is Scientifically Impossible to Achieve with Today's Technologies
- *SRP... Why are we doing this?*



SRP...

Why Are We Doing This?

Environmental Efficiency?

1/2 Square Mile (SGS) vs.

36 Square Miles (Solar)

#1 Human annual power consumption is equivalent to the energy the Earth receives from the Sun in just ONE hour. A total of 173,000 terawatts (trillions of watts) of solar energy strikes the Earth continuously. That's more than 10,000 times the world's total energy use. (US Dept Energy)

Other Land / Cultural Impacts... *How Do You Put a Price / Cost On This?*

- SunZia Transmission Line... SRP Sustainability In Practice
 - o Actions speak louder than Words
- Out of sight, Out of Mind... NIMBY Alive and well
- Do any of you live under transmission line? Ever see transmission lines? Not only are they unsightly, they hum and they leak electrons
- Native Americans getting “hosed” again... remember the Navajo GS?



[Home](#) > [Programs](#) > [Planning and NEPA](#) > [Land Use Plans](#) > [New Mexico](#) > SunZia Southwest Transmission Project

SunZia Southwest Transmission Project

The SunZia Southwest Transmission Project (Project) comprises two planned 500 kilovolt (kV) transmission lines located across approximately 520 miles of Federal, State, and private lands between central New Mexico and central Arizona. The purpose of the Project is to transport up to 4,500 megawatts of primarily renewable energy from New Mexico to markets in Arizona and California.

Judge dismisses Native American challenge to \$10B SunZia energy transmission project in Arizona



This aerial photo taken on Nov. 13, 2023, by Archaeology Southwest with a volunteer pilot and Lighthawk, a nonprofit organization, shows new access roads and tower pad sites west of the San Pedro River, near Redrock Canyon, in Arizona. In a ruling Thursday, June 6, 2024, a U.S. district judge dismissed claims by Native American tribes and environmentalists who sought to halt construction along part of a \$10 billion energy transmission line. (Archaeology Southwest via AP)

A U.S. district judge has dismissed claims by Native American tribes and environmentalists who sought to halt construction along part of a \$10 billion energy transmission line that will carry wind-generated electricity from New Mexico to customers as far away as California.

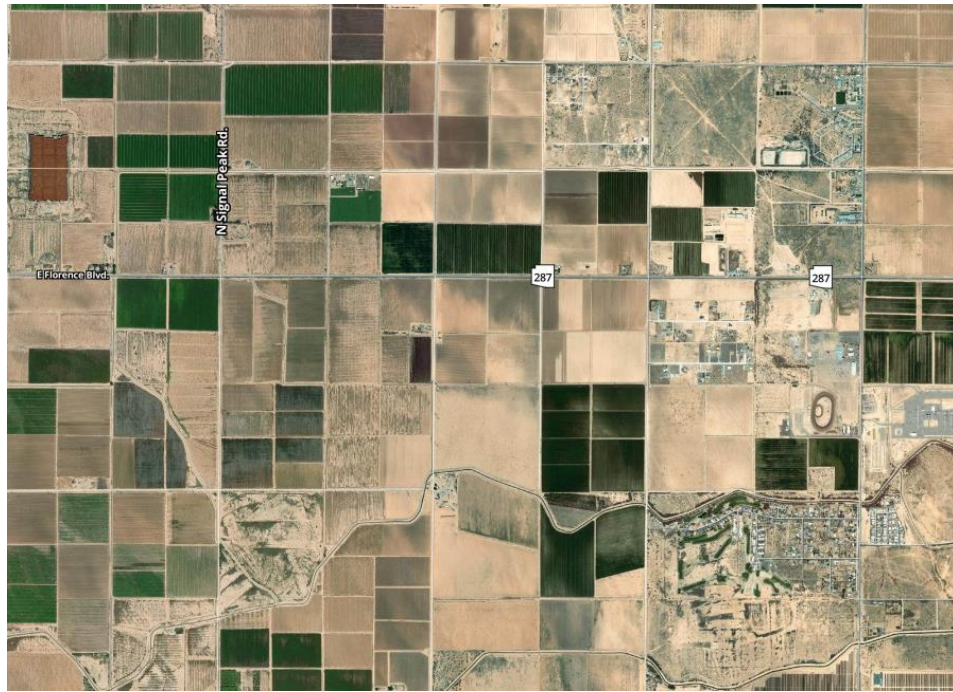
The disputed stretch of the SunZia transmission line is in southern Arizona's San Pedro Valley and passes through an area that holds historic, cultural and religious significance for the tribes.

The Tohono O'odham Nation — along with the San Carlos Apache Tribe, the Center for Biological Diversity and Archeology Southwest sued in hopes of stopping the clearing of roads and pads so more work could be done to identify culturally significant sites within a 50-mile stretch of the valley.

Not Totally NIMBY... Introducing the STOREY SOLAR ENERGY CENTER 88 Megawatts of Clean Energy in Pinal County and the City of Coolidge, Arizona

- The project encompasses ~996 acres or 1 ½ square miles of former green farm land
NOTE: This is equivalent to less than 800 MWh / day, about 45 minutes worth of the Santan Generating Station output, yet takes up more than 1.5 square miles of land.

Before



After



Hopefully, Common Sense Is Prevailing

A federal judge is ordering three companies to remove more than 80 wind turbines from an Oklahoma prairie. While it may be a setback for green energy production, it's a victory for citizens of the Osage Nation, which worked to remove the turbines from land they say is sacred. January, 2024 <https://www.npr.org/2024/01/18/1225446424/wind-turbines-on-sacred-osage-land-must-be-removed-according-to-court-ruling>

Remotely purchased Generation supply, quantity and pricing, is outside of SRP's control, thus putting SRP customers at risk. Mitigating risk is why utilities are allowed to be monopolies. This type of business model / practice defeats the benefits to customers.

SRP Operations & Common Sense

- Operational Efficiency – Base Loaded Units Are Most Efficient
 - o Like one's car; open highway, cruise control, best gas mileage
 - o Stop & Go traffic, worst gas mileage & hard on vehicle components & operators
- Renewables are NOT Reliably Dispatchable / Requires more spinning reserve which means less efficiency (Stop & Go traffic)
- Batteries work for a short time, but quickly degrade & have 20%+ energy loss (Less than 80% round-trip efficiencies)
- Current Plan Designed to Waste Energy
 - o Line Losses – 5% - 10% of Total Generation
 - o Parasitic Load – Electronic don't like heat; AC for batteries
 - o Asset degradation & round-trip energy losses
 - o Too Much Generation – Negative Pricing (Don't California my AZ Utility)
 - Who knows that SRP (all large electric utilities) has a trading desk?
- **Waste Not, Want Not... Repurpose De-commissioned Assets**
 - o Existing transmission lines from Page and St. John, but
 - o Base-Load Assets being decommissioned (NGS gone, Coronado Reduced, 4 Corners 3 units closed, Tri-State gone)
 - o Side Note: NGS water rights lost? 34,100 Acre Feet? Where is that? Utah?
 - All could have been converted to natural gas
 - Would have benefited local communities (Page & Kayenta)
 - Readily dispatchable / Infrastructure in place (especially land footprint)

-Energy Demand Is Skyrocketing!

- Welcome to the digital world that we can't see... digital pollution everywhere!
- **Caution: Continued use of this device will substantially increase your carbon footprint**
 - o Maybe we should just limit everyone's use of anything digital to just 15 minutes / person / day? Phones, computer, Netflix, car GPS, Ring doorbells?

Elections Have Consequences...

- Executive Order stopping all solar / wind generation; impact to SRP?
 - o Owned / Contracted PPA
 - o Purchase of "negative priced" energy
 - o Halting Net Zero Spending
- What is Plan B?
 - o IRA Funds for Gas Turbines?
 - o Drill, Baby, Drill?
 - o Pumped Hydro / Gravity Storage (BEST renewable energy)
 - Energy Vault w/ weights
 - Submersible Mass ($KE = MV^2 / 2$)
 - o New technologies / Organic (C) Batteries
 - o Mini Nukes
 - o Headcount / Cost Reductions
 - o Moratorium on new connections

Closing Thoughts / SRP's Pitch

So, in summary, the Board of SRP is asking, well telling, its customers, me, that I should support an increase in my electric bill so that hundreds of square miles of virgin, and in some cases, sacred, Southwest lands are to be destroyed, killing millions of native creatures, including those on endangered species lists, to build a system that is much less energy efficient than the current system, increasing the length of the supply chain by hundreds of miles thus reducing reliability and increasing the opportunity for cyber threats, all for a government driven policy plan that is scientifically unachievable and more like a Tower of Bable folly.

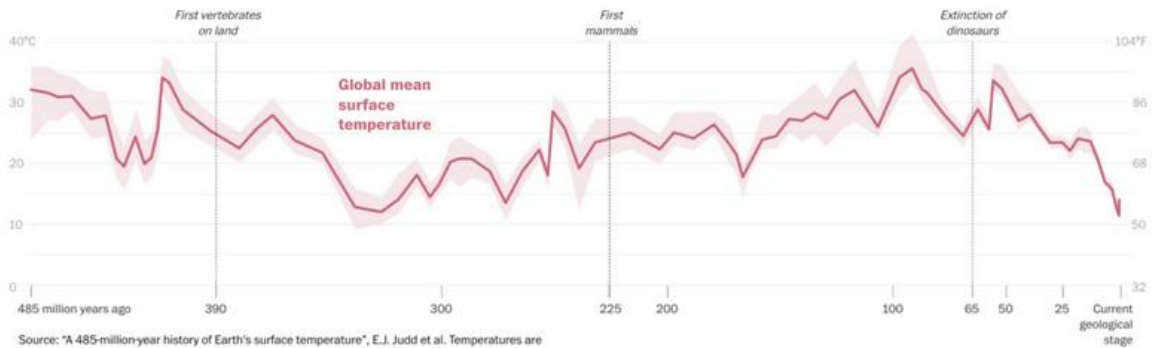
Call me crazy, but I'm not in favor in any of that. And neither should anyone in this room. This isn't about "right and left", this is about "right and wrong".

Why is SRP against Mother Nature? **Why are we doing this?** Thank you.

Scientists have captured Earth's climate over the last 485 million years. Here's the surprising place we stand now.

An effort to understand Earth's past climates uncovered a history of wild temperature shifts and offered a warning on the consequences of human-caused warming.

🔒 10 min 📌 📄 1703



By Sarah Kaplan and Simon Ducroquet
September 19, 2024 at 2:01 p.m. EDT

How often have we heard, the math and science are correct! You are a science denier! Consider this...

The average growth of a new borne human baby over the first 6 months of its life is ~an inch / month and doubling its weight, or ~ 1.5 pounds per month. Using this data and extrapolating to when a human is 80 years old, the average adult would weigh 1,448 pounds and be 82 feet tall! The math is undeniably correct... the science is settled! Yet there are still Polar Bears, New York City is not under 10 feet of water and life on the planet has not ended! How could that be? No 82 foot all humans AND Polar Bears!

Common Sense Counts

- If Net Zero 2050 is achievable thru policy, then lets put together a policy for Life 150, i.e., everyone lives to be 150 years old by 2050! And if you don't comply, you'll be put in jail for the rest of your life!
- Remember the story of the Tower of Babel in the Bible? How is this any different?
- The sun is the center of the solar system. There are two genders.
- ***This is NOT about right or left, this is about right and wrong.***

Name: Holly Tullar

Record Number: 604b9a00

Delivery Method: Digital Submission

Comment:

I took my 2024 usage and applied your new rates + monthly base charge. It results in a 12% increase. Far more than your 3.4% increase quoted. My husband and I live in a 1684 sq ft house and live off of approximately \$50k a yr. The majority of your increase is from the proposed \$20 to \$30 service charge. I can't calculate the business rate increase impact but all of your increases will continue to fuel inflation in a never ending loop. A 50% increase in the service charge is unacceptable. Be reasonable. I will make sure to vote against every single SRP council member that votes for this increase. Just like I will vote against every single Arizona Corporate Commission member that unanimously voted to increase monthly water base rates by 26% this past year. I keep a list and will share it with everyone I can.

SRP Public Price Process Comments from: 2/1/2025

Name: Elizabeth M McNamara

Record Number: bb7bcd55

Delivery Method: Digital Submission

Comment:

The price concern is one thing but change in TOU plans is horrifying. How do you expect folks in AZ to not use their ac between the hours of 6-9pm or 5-10pm. That is beyond ridiculous. Also, your information states super off peak is until 3pm but doesn't elaborate what happens after that time. So on peak to some extent will be 3-10pm? Outrageous. You obviously care nothing for homeowners well-being. It's not like we have a choice in utility Co & can shop around. I truly hope this change is not allowed to go into effect. It's a public safety issue

Name: Norm Sandler

Record Number: c340a8db

Delivery Method: Digital Submission

Comment:

This article could not be more timely! Once the largest solar field in the world is shutting down after on 11 years of operation. Why? these are NOT 30 year assets AND, because of the huge government subsidies, there is no accountability. 11 years after a celebrated opening, massive solar plant faces a bleak future in the Mojave Desert What was once the largest solar power plant of its type in the world appears headed for closure just 11 years after opening. Rats... I had hoped to be able to attach the hyperlink to the article, but "Invalid Characters Entered" message, so just the headline. Either way, this has put on smile on Mother Nature's face... mine too!

Name: Travis Hartner

Record Number: b97370c9

Delivery Method: Digital Submission

Comment:

Dear SRP Board Members, [REDACTED] I am writing to express my strong opposition to the proposed rate plan changes, which will negatively impact solar customers like myself. [REDACTED] These changes [REDACTED], reducing the value of daytime solar energy, limiting grandfathering protections, and increasing demand charges [REDACTED], penalize families and small businesses who have chosen to invest in renewable energy. [REDACTED] SRP has an opportunity to lead the way in supporting clean energy and sustainable growth in Arizona. I urge you to reject these proposals and instead implement policies that empower customers to adopt solar energy without fear of unfair treatment. [REDACTED] Thank you for taking immediate action to ensure SRP's policies remain fair and forward-thinking. [REDACTED] Sincerely, Travis Hartner
Queen Creek AZ [REDACTED]
