

SRP Price Process Comments with Response

Week ending February 22, 2025

SRP Public Price Process

Responses from: 2/17/2025

Name: Mark Greene

Record Number: 9c604e93

Delivery Method: Digital Submission

Received Date: 1/24/2025

Comment:

Why is the sunset period on current solar plans only till 2029? Current plans or should I say previous plans have had grandfathered rate plans for 20 years. Why shortchange solar customers who have invested with good intentions?

Response Subject: SRP Corporate Pricing Response to Public Comment #9c604e93

Response:

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

As you may mention, in previous pricing processes, grandfathered solar customers (those who originally installed the on-site generation at a residence on or before December 8, 2014, or who (i) by such date, either delivered to SRP a fully-executed contract for the installation of the on-site generation or had an SRP Residential Solar Electric Program Application for the on-site generation pending with SRP, and (ii) interconnected the generating facility with SRP's electrical grid by February 26, 2016) were exempted from mandatory participation in one of the price plans designed for solar customers (E-13, E-14, E-15, or E-27) The exemption would be effective, at the residence where the system was originally installed, until the later of (a) March 31, 2025, or (b) the date that is 20 years after the date on which SRP initially interconnected the generating facility on which the

exemption is based to SRP's electrical service grid. Put simply, grandfathered solar customers would continue to be able to take service on a standard residential plan and the Renewable Net Metering Rider for 20 years from their interconnection. SRP management is not proposing any changes to the foregoing exemption, except for an extension of the March 31, 2025 date to November 1, 2025. Note that while the exemption permitted grandfathered customers to stay on a standard residential price plan, it did not fix or limit the prices those customers would pay under those plans. Grandfathered solar customers, like all SRP customers, are still subject to price changes, including changes to the monthly service charge and TOU hours.

Name: MANTILLA YOLANDA

Record Number: 428c34b2

Delivery Method: Digital Submission

Received Date: 2/3/2025

Comment:

Por que subio el costo tanto para los jubilados. Por que no tiene una asistencia para los seniors.

Response Subject: SRP Corporate Pricing Response to Public Comment
#428c34b2

Response:

Yolanda,

Gracias por tu comentario. Los precios están aumentando para todos los clientes residenciales. SRP no cuenta con asistencia específica para los jubilados, pero hay asistencia disponible para personas de bajos ingresos. Puede llamar a la línea de SRP al 602-236-1111 para obtener más información.

Gracias.

SRP Public Price Process

Responses from: 2/18/2025

Name: David Bender

Record Number: 54ec2c1e
Delivery Method: Digital Submission
Received Date: 1/22/2025

Comment:

These questions (third set) continue numbering from the two prior sets submitted:

18. Reference the spreadsheet produced by SRP titled "PF25 Financial Plan Model- CAS Inputs_EJ01.xlsm". a. Confirm that the values in the "Test_Year_Pricing" tab in cells F27-H57 reflect the annual depreciation expense for the generation resource in column E. If not, please describe what the values in cells F27-H57 reflect. b. Confirm that the values in E58-H87 reflect annual operating and maintenance (O&M) expenses for the generation resource in column E. If not, please describe what the values in cells F27-H57 reflect. c. Confirm that the values in E109-H108 reflect annual fuel expenses for the generation resource in column E. If not, please describe what the values in cells E88-H108 reflect. d. Confirm that the values in E109-H132 reflect annual fuel expenses for the generation resource in column E. If not, please describe what the values in cells E109-H132 reflect. e. For each of the generation sources identified in column E, separately for each of the fiscal years FY2024-FY2026, identify the amount of net generation projected to be provided at the point of transmission interconnection in megawatt hours that corresponds to the projected fuel and O&M costs. For example, the amount of generation from Four Corners during FY2024 that corresponds to \$39,247,000 in fuel costs reflected in cell F88.

19. Please produce the loss of load probability analyses, if any, conducted for the Coolidge Expansion Project, Cooper Crossing solar, storage and (or) natural gas generation, and any power purchase agreements you considered within the most recent three years.

20. Reference your December 2, 2024, Cost Allocation Study at p. 3. a. Please provide a copy of the "demand-related contracts to purchased power" referenced, which the CAS indicates SRP "added a significant number of" since the previous cost allocation study. b. For each such contract, please describe how "demand" is priced and charged to SRP through the contract.

21. Reference the December 30, 2024, amended Proposed Adjustments to SRP's Standard Electric Price Plans document at page 32, Figure 7. a. Please identify each of the 16 utilities referenced in the figure. b. For each of the 16 utilities referenced, please provide the rates used to calculate the comparison, separated by customer class and rate component (i.e., fixed, demand, and energy charge).

Response Subject: SRP Corporate Pricing Response to Public Comment
#54ec2c1e

Response Attachments: SRP Management Response to EarthJustice Third
Request for Information_EJ03.pdf;

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #54ec2c1e*

Response:

See SRP Management Response to EarthJustice Third Request for
Information_EJ03 for response details

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

These questions (third set) continue numbering from the two prior sets submitted:

18. Reference the spreadsheet produced by SRP titled "PF25 Financial Plan Model- CAS Inputs_EJ01.xlsm".
- a. Confirm that the values in the "Test_Year_Pricing" tab in cells F27-H57 reflect the annual depreciation expense for the generation resource in column E. If not, please describe what the values in cells F27-H57 reflect.
 - b. Confirm that the values in E58-H87 reflect annual operating and maintenance (O&M) expenses for the generation resource in column E. If not, please describe what the values in cells F27-H57 reflect.
 - c. Confirm that the values in E109-H108 reflect annual fuel expenses for the generation resource in column E. If not, please describe what the values in cells E88-H108 reflect.
 - d. Confirm that the values in E109-H132 reflect annual fuel expenses for the generation resource in column E. If not, please describe what the values in cells E109-H132 reflect.
 - e. For each of the generation sources identified in column E, separately for each of the fiscal years FY2024-FY2026, identify the amount of net generation projected to be provided at the point of transmission interconnection in megawatt hours that corresponds to the projected fuel and O&M costs. For example, the amount of generation from Four Corners during FY2024 that corresponds to \$39,247,000 in fuel costs reflected in cell F88.

SRP Response:

- a. Cells F27:H57 reflect the annual depreciation expense for generation resource indicated in cells E27:E57; note, however, that only FY2026 was used in this Price Process.
- b. Cells H58:H87 show the annual operating and maintenance (O&M) expense for the Test Year for the generation resource indicated in cells E58:E87.
- c. We presume your question pertains to Cells H88:H108. Those cells show the budgeted Fuel for the resources indicated in E88:E108. But note that the Financial Planning process uses a definition of Fuel that differs slightly from the Board-approved definition of FPPAM, so the figures in these cells are not used for the Cost Allocation Study. See Schedule 1a in the Cost Allocation Study for the FPPAM Fuel costs used in the Test Year.
- d. They do not represent fuel expenses. Cells H109:H131 represent in-lieu taxes SRP has budgeted for the test year associated with the generating resources indicated in cells E109:E131. H132 represents in-lieu taxes SRP has budgeted for the test year associated with transmission assets.

e. See table below:

Resource	FP24FY24 Budget MWh	FP25FY25 Budget MWh	FP25FY26 Budget MWh
Agua Fria	3,572	7,495	49
Kyrene	520,477	596,528	1,021,023
Santan	3,261,502	4,232,322	3,957,134
Desert Basin	2,579,795	2,660,541	2,664,904
Coolidge	17,923	4,069	986
Mesquite	3,384,527	3,508,237	3,287,641
Gila River	3,751,234	4,851,578	6,012,377
Copper Crossing (Thermal)	0	3,253	2,159
Coronado	3,245,695	4,122,217	4,050,038
Four Corners	833,818	978,198	1,017,138
Craig	1,933,965	1,136,119	1,025,793
Hayden	1,027,728	981,202	956,496
Springerville	2,604,666	2,626,311	2,580,834
Palo Verde	6,373,700	6,457,036	6,511,195

19. Please produce the loss of load probability analyses, if any, conducted for the Coolidge Expansion Project, Cooper Crossing solar, storage and (or) natural gas generation, and any power purchase agreements you considered within the most recent three years.

SRP Response:

SRP does not perform LOLP analysis for individual resource selections, but rather evaluates each resource type's ability to reliably meet a range of future generation needs and load profiles. The ability of different resource types to reliably serve SRP's load is dependent on a number of factors, including weather conditions, firm fuel supplies, occurrence of forced outage events, and the duration for which a resource is designed to generate electricity.

20. Reference your December 2, 2024, Cost Allocation Study at p. 3. a. Please provide a copy of the "demand-related contracts to purchased power" referenced, which the CAS indicates SRP "added a significant number of" since the previous cost allocation study. b. For each such contract, please describe how "demand" is priced and charged to SRP through the contract.

SRP Response:

SRP cannot provide copies of those contracts because the terms are confidential and they contain competitively sensitive information. To be as transparent as possible, below is a list of the contracts for which some portions of the costs were determined to be demand-related in the Cost Allocation Study (CAS), and the description of how the demand-related portions of their costs were determined therein.

Some of SRP's power purchase contracts specify a separate capacity price (\$/kW-month) and energy price (\$/MWh). For example, standalone storage projects are purchased for capacity and so are classified as "demand-related" in the CAS and typically have a contracted \$/kW-month fixed price. Other purchases, such as solar and storage, are made for both energy and capacity reasons and have a \$/MWh price for the energy and a \$/kW-month price for capacity specified in the contracts. In the CAS, the dollars SRP paid on a \$/MWh basis were classified as energy-related and the dollars SRP paid on a \$/kW-month basis were classified as demand-related. The contracts for the following purchases contain information specifying the \$/kW-month; the portion of these purchases classified as demand-related in the CAS totaled \$375.7M (some of the purchases also had dollars classified as energy-related; the \$375.7M is only the portion SRP paid on a \$/kW-month basis):

- Colorado River Storage Project (CRSP) Federal Hydro Power
- Parker Davis Federal Hydro, SRP Allocation
- Arizona Power Authority (APA) Federal Hydro, SRP Allocation
- Arizona Power Authority (APA) Hoover Scheduling Entity Agreement
- Springerville 3
- Harquahala
- Sonoran Solar Energy Center, Solar and Energy Storage
- Storey Solar Energy Center, Solar and Energy Storage
- Saint Solar and Energy Storage Center, Solar and Energy Storage
- Sierra Estrella Energy Storage
- Superstition Energy Storage
- Eleven Mile Solar Center, Solar and Energy Storage
- Brittlebush Solar Park and Flatland Energy Storage
- Pediment Energy Storage
- Pinal Central Energy Center, Solar and Energy Storage
- Budgeted \$2.6M storage project

Some of SRP's purchases were made for both energy and capacity, but the contracts do not break out energy and capacity prices individually. These contracts typically bundle the costs into a \$/MWh price. SRP's market traders had an estimate of the FY26 24/7 carbon-free energy value to SRP. For contracts that do not specify the energy and capacity prices individually, SRP management assumed in the CAS that any amount up to the estimate of FY26 energy value was energy-related, and any remaining dollars in those contracts were demand-related. The portion of these purchases that was above the calculated energy value to SRP and included in the demand-related category in the CAS was \$69.3M.

- Palo Verde Contract
- CalEnergy Geothermal
- Hudson Ranch 1 Geothermal
- Cove Fort Geothermal
- Novo BioPower Biomass

In addition to the above, \$0.99M of budgeted summer market purchases were determined to be demand-related.

21. Reference the December 30, 2024, amended Proposed Adjustments to SRP's Standard Electric Price Plans document at page 32, Figure 7. a. Please identify each of the 16 utilities referenced in the figure.

b. For each of the 16 utilities referenced, please provide the rates used to calculate the comparison, separated by customer class and rate component (i.e., fixed, demand, and energy charge).

SRP Response:

The following companies were included in the development of Figure 7:

Arizona

Salt River Project
Arizona Public Service Co
Unisource Energy - Citizens/AZ
Tucson Electric Power Co

California

Southern California Edison Co
San Diego Gas & Electric Co
Los Angeles Department of Water & Power
Pacific Gas & Electric Co.
Sacramento Municipal Util Dist

New Mexico

Public Service Co of NM
El Paso Electric Co

Nevada

Nevada Power Co
Sierra Pacific

Colorado

Public Service Co of Colorado
City of Colorado Springs - (CO)

Utah

PacifiCorp

The average cents per kWh were calculated by taking the total retail revenues divided by the total retail sales for each utility in each state as reported in the Department of Energy EIA-861M (formerly EIA-826) Reports for 12 months ending August 31, 2024 for the 16 utilities. Arizona's average does not include SRP. No specific rates were used to calculate the values.

Name: Heather fial

Record Number: 20a5933d
Delivery Method: Digital Submission
Received Date: 1/25/2025
Comment:

Dear SRP, Thank you for the opportunity to provide feedback regarding the proposed price increase. While I understand that operational costs may necessitate changes, I am concerned about the impact this increase will have on customers, especially those on fixed incomes or with limited financial flexibility. I would appreciate it if SRP could: 1. Provide transparency about how the additional revenue will be used. 2. Consider phased or gradual increases to reduce financial strain. 3. Expand assistance programs for low-income households to help mitigate the impact. Additionally, I encourage SRP to explore further investments in renewable energy and efficiency programs, which could reduce long-term costs for both the company and its customers. Thank you for your time and for considering this feedback. Sincerely, Heather Fial

Response Subject: SRP Corporate Pricing Response to Public Comment #20a5933d

Response:

Heather,

Thank you for your interest in SRP's Pricing Process. Please find the response to your inquiry below.

1. 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. There is a good summary of SRP expenses starting on page 16 of Management' proposal, available here:

<https://www.srpnet.com/assets/srpnet/pdf/price-plans/2024/Modifications%20to%20the%20Proposed%20Adjustments%20to%20SRP's%20Standard%20Electric%20Price%20Plans%20and%20Appendix%20A%20Effective%20Nov%202025.pdf>

2. SRP's Board of Directors formally adopted a set of Pricing Principals in December 2000 to guide the pricing of SRP's electric service. One of those principles is Gradualism, which seeks to enhance sound economic decision-making by customers of all types through stabilizing price levels and smoothing

the impact of cost movements that may be caused by temporary factors. Gradualism, and the other Pricing Principles, were used in the development of price plans and associated policies in Management's Price Proposal. Your request for more gradual increases will be made part of the public record.

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

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

Name: Jonathan M Simonton

Record Number: e72c1e75

Delivery Method: Digital Submission

Received Date: 2/3/2025

Comment:

difficult to see your electricity use go down because you are using less to save money and being smarter with your use and then get charged more for using less. Does it have to be like that?

Response Subject: SRP Corporate Pricing Response to Public Comment
#e72c1e75

Response:

Hi Jonathan,

Thank you for your comments to 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.

If you have any other questions or need further assistance, please call customer service at 1 (602) 236-8888

Thank you.

Name: Christie Black

Record Number: 552c8deb
Delivery Method: Digital Submission
Received Date: 2/8/2025

Comment:

I appreciate the introduction of two new TOU plans to help customers with increasing costs. I don't understand, however, how SRP can justify increasing solar customer costs more than regular customers. I don't personally have solar, but I really appreciate those homeowners who do. They're doing their part to increase energy production and reduce the impact they have on the overall grid. Isn't that something we should be incentivizing all customers to do? Isn't that what the new TOU plans are intended to do? Please reconsider the cost increase for solar customers. It isn't right.

Response Subject: SRP Corporate Pricing Response to Public Comment #552c8deb

Response:

Christie Black,

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

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

At the same time, management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal 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.

SRP Public Price Process

Responses from: 2/19/2025

Name: Blake Sacha

Record Number: 8a176fac
Delivery Method: Digital Submission
Received Date: 2/18/2025

Comment:

Why are residential solar customers being charged more with this increase? The explanation does not provide any justification for charging solar customers more than the additional amount already paid. Existing solar customers don't cost any more than non-solar customers.

Response Subject: SRP Corporate Pricing Response to Public Comment #8a176fac

Response:

Blake Sacha,

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

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

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

Name: Mark F Miller

Record Number: 8e9ad8e5
Delivery Method: Digital Submission
Received Date: 2/19/2025

Comment:

Is the customer generated price plan going away?

Response Subject: SRP Corporate Pricing Response to Public Comment
#8e9ad8e5

Response:

Hi Mark,

Thanks for reaching out.

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

Name: April Ayers

Record Number: MI7095718
Delivery Method: Email to Corporate Secretary
Received Date: 2/19/2025
Attachments: Solar Customer Rate Increase_April.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI7095718*

Comment:

From: April Ayers
Sent: Tuesday, February 18, 2025 8:51 PM
To: SRP Corporate Secretary
Subject: Solar Customer Rate Increase

I'm writing this in response to a news story I just viewed re: a possible rate increase for SRP customers. This story mentioned that solar customers would receive a higher increase than standard SRP customers.

I am requesting an explanation as to how it places more demand on the grid or the system to deliver electricity to my house (solar) than to my next door neighbor (non solar)?

We actually alleviate demand OFF the grid. You buy our electrical power surplus at a lower rate than what you sell it for. Solar customers help the extreme demand on our grid in multiple ways yet you want to punish us? You will penalize my household instead of my neighbor who does nothing to improve your situation or our planet?

Please respond in a timely fashion as I will be contacting the Utility Commission and will be attending the meeting with the Public Board of Directors meeting on the 27th. I can work with Az Family since they aired the story to be sure they are present as well. They will assist with publicizing this issue until we reach a resolution.

Thank you in advance for your time. I look forward to speaking with you.

April Ayers

Response Subject: SRP Corporate Pricing Response to Public Comment
#MI7095718

Response:

April Ayers,

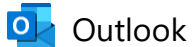
SRP understands that rooftop solar panels can be a significant investment and appreciates your commitment to renewable energy. Your SRP bill will be lower with solar generation than it would be without, though SRP must bill for the amount needed to cover the costs of providing you with electric service.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

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

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

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

At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and 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.



RE: SRP Response: Price Process: Info Room - SN-02 Request

From Ashleigh Hope <[REDACTED]>
Date Wed 2/19/2025 10:30 AM
To steven.stuart.neil <[REDACTED]>
Cc John M Felty <[REDACTED]>; Melissa J Burger <[REDACTED]>; Lora F Hobaica <[REDACTED]>

■ 3 attachments (460 KB)

0010.Price Plan Comparison.pptx; 0008.MDMS Replacement Project Status Report 20240809.pdf; 0010.Price Plan Comparison - TIBCO Option (later, more accurate version).pptx;

Hi Mr. Neil – I'm glad you found the summary helpful. I've been able to track down three of the four linked attachments which are provided here. I am still working on the 001. document and will provide it if/when I'm able. I'll keep you updated on my progress no later than the end of this week. Thanks,

Ashleigh Hope (she/her)

P: [REDACTED] | **E:** [REDACTED]

From: Steve Neil <[REDACTED]>
Sent: Monday, February 17, 2025 1:12 PM
To: Ashleigh Hope <[REDACTED]>
Cc: John M Felty <[REDACTED]>; Melissa J Burger <[REDACTED]>; Lora F Hobaica <[REDACTED]>
Subject: Re: SRP Response: Price Process: Info Room - SN-02 Request

CAUTION: This email originated from outside the organization
Beware of suspicious links, files, or requests. When in doubt report as phishing.

Thanks for these, especially the pdf writeup summarizing the issue.

A few things I noticed while reading them:

The msg named [0001.RE MDMS Replacement consolidated Lessons Learned.msg](#) has a linked attachment named Lessons Learned consolidated.docx, but I don't see it in the zip file.

The msg named [0008.RE MDMS Replacement Project Status Report.msg](#) has a linked attachment named MDMS Replacement Project Status Report 20240809, but I don't see it in the zip file.

The msg named 0010.Fwd Price Plan and Smart Alerts daily update.msg.MSG has a linked attachment named Price Plan Comparison.pptx, but I don't see it in the zip file.

Can you email me those? Or just let me know where to find them.

On Mon, Feb 17, 2025 at 7:24 AM Ashleigh Hope [REDACTED] wrote:

Hi Mr. Neil –SRP’s third production in response to your QU12 request seeking “emails/documents explaining the technical reason the Price Process Comparison tool was decommissioned” can now be accessed via SRP’s Managed File Transfer site (linked below). As I reviewed the emails, it became apparent that what I produced on February 4, 2025 was actually the most technical/responsive information we have. I did find some additional emails that provide further context (and I’ve included the attached links where they were available), but I don’t think these records provide the full explanation you are seeking. As such, I also asked our IT Department to write a memo that explains in detail the technical reasoning for the Price Process Comparison Tool’s decommissioning. I hope that between the memo and the emails/documents, SRP has provided a satisfactory answer to your question.

To view the response, please click [this link](#) and follow the instructions below:

1. Click **Create Account**. (If you created an account in the past, you will not see a prompt to create a new one. Please skip to Step 5 and log in with your previously created credentials.)
2. Enter your email address and desired password.
3. Click **Create Account**. (A confirmation email will be sent to the email address you entered.)
4. Open the confirmation email and click **Activate Account**. (You will be redirected to the SRP Managed File Transfer site.)
5. Log in to the site with your email address and password.
6. Download the file(s) to your desktop.
7. When you are finished, log out.

Please note: The files will be available for approximately **2 weeks**, so please download what you need before then.

Best Regards,
Ashleigh Hope (she/her)

[REDACTED]

From: Ashleigh Hope

Sent: Tuesday, February 11, 2025 10:29 AM

To: Steve Neil [REDACTED]

Cc: John M Felty [REDACTED]; Melissa J Burger [REDACTED]; Lora F Hobaica [REDACTED]

Subject: RE: SRP Response: Price Process: Info Room - SN-02 Request

Hi Steve – I’m writing to document our recent phone call regarding your request below. As we discussed, SRP charges \$0.25 per page and \$25 per hour for Public Records Request productions. As such, you have chosen to withdraw your Public Records Request and instead proceed under the Price Process with a narrowed request. Your amended request now seeks emails/documents explaining the technical reason the Price Process Comparison tool was decommissioned. I will continue working on that response and will provide it to you as quickly as possible. Thank you,

Ashleigh Hope (she/her)

[REDACTED]

From: Steve Neil [REDACTED]

Sent: Wednesday, February 5, 2025 6:42 PM

To: Ashleigh Hope [REDACTED]

Cc: John M Felty [REDACTED]; Melissa J Burger [REDACTED]; Lora F Hobaica [REDACTED]

Subject: Re: SRP Response: Price Process: Info Room - SN-02 Request

CAUTION: This email originated from outside the organization
Beware of suspicious links, files, or requests. When in doubt report as phishing.

Ashleigh, I won't belabor the issue by discussing your points. My original request on 12/5 was sufficiently clear I think, and you called on 1/9 and got some more clarity. My email earlier today clearly points out that SRP has not fulfilled this request.

John and Melissa, please consider this to be a public records access request. You can ignore the requests/questions for some terms to be explained. Just provide the documents, both emails, their attachments, and other documents that have anything to do with price plan comparison and other ways of stating it.

--Steve

On Wed, Feb 5, 2025 at 5:04 PM Ashleigh Hope [REDACTED] wrote:

Hi Mr. Neil:

Concerning your questions about replies or attachments to emails already produced, I will endeavor to provide those materials.

With respect to your other requests, the necessary queries are likely to yield thousands of results, many of which may include confidential customer information, and none of which can be produced without first undergoing a thorough and time-consuming review. Further, based upon a review of the requests, they bear little to no relation to management's pricing proposal or the current price process, and any response is unlikely to meaningfully expand on the information you've already received in written responses and management interviews.

SRP management has, at this time, concluded that based on the large volume of content, the scope of the necessary review, and the lack of a nexus between responsive content and the current pricing proposal, your request below is unduly burdensome and not material to the proposal at issue in front of the Board of Directors. SRP management is willing to engage in a good faith discussion with you to address this conclusion and is open to reconsidering this position to the extent you can provide an explanation as to how this material is relevant. Until that good faith discussion occurs, in accordance with SRP's Rules and Regulations, management is declining further production on this subject under the price process.

As you can appreciate, SRP staff has spent hundreds of hours responding to your requests and has sought in good faith to be responsive. We will be happy to further discuss if you are available.

Thank you,

Ashleigh Hope (she/her)

P: [REDACTED]

From: Steve Neil <[REDACTED]>**Sent:** Wednesday, February 5, 2025 1:14 PM**To:** Ashleigh Hope <[REDACTED]>**Cc:** John M Felty <[REDACTED]> Melissa J Burger <[REDACTED]>; Lora F Hobaica <[REDACTED]>**Subject:** Re: SRP Response: Price Process: Info Room - SN-02 Request

CAUTION: This email originated from outside the organization
Beware of suspicious links, files, or requests. When in doubt report as phishing.

Thanks. I had no problem viewing the pdfs in the .zip file. BTW, I open dozens of pdfs a day, and Adobe keeps my browser extension and desktop app automatically updated, and this is the first time I've had any trouble so ... your side may be doing something different than normal.

I have a few questions and requests after reviewing these emails. Let me know how you would like for these to be submitted. Please note that, unlike most pdfs I get, I can't highlight and copy text from these, so I'm having to snip images of the text and those cannot be submitted on the feedback form. And I see the acronym PPC (for price plan comparison) over and over in the emails, so I'll use that shortcut below too.

And to reiterate, I first opened my E-28 request on Dec 2 and this PPC request on December 5, and here we are two months later. As a consumer advocate, I think these topics are extremely important. So here goes:

1. Several emails discuss that the original reason for "taking down" the PPC was because the E-28 price plan was being introduced. I request the messages discussing the details of this, and it is likely to involve staff outside of billing, customer service, etc., and it may involve contract employees and I'm expecting to see those too for all requests.
2. I see a lot of mention of technical issues with populating meter or bill data into some new information system. But no conversations about the exact problem and discussions about efforts to resolve it. Can you send those messages too?
3. I'm sure there is documentation that describes the data architecture and process flow and other technical aspects; please forward that. Also, I see some technical names of different pieces of the PPC like rate_compare, VEE data, RAW data, and it would be great if the documentation explained the terms and if any are synonyms with other terms.
4. Two snips from 0042.2025 Pricing Project Requirements Review.msg.MSG.pdf

Re 30 minute demand, did they consider 60 minute?
What is a field program?

Please describe the who, what, when, how, why, etc. of the 6-month grace period.
Who are the sponsors and their job title and role in PPC?

5. The pdf named 0041.TOU Pilot Monthly Usage Letter.msg.MSG.pdf asks for a reply, but I don't see that. If no reply, please forward an answer to the question asked.

6. Several emails show that there was an attachment/s. But I don't see any attachments. Please forward.

7. I see a Powerpoint referenced that is named "Price Plan Comparison and Smart Alerts. Have that already been provided? I'm not seeing it.

On Wed, Feb 5, 2025 at 9:56 AM Ashleigh Hope <[REDACTED]> wrote:

Hi Mr. Neil: I provided 148 pages of email. I believe the issue is the viewing format. I have uploaded each email separately and saved it into a zipped folder in the same location, [LINKED HERE](#) for your convenience. I trust this resolves your technical issues. As to the date range, the emails span from 2019 to 2024, when the Price Plan Comparison Tool was decommissioned.

Thank you,

Ashleigh Hope (she/her)
[REDACTED]

From: Steve Neil <[REDACTED]>
Sent: Tuesday, February 4, 2025 8:46 PM
To: Ashleigh Hope <[REDACTED]>
Cc: John M Felty <[REDACTED]>; Melissa J Burger <[REDACTED]>; Lora F Hobaica <[REDACTED]>
Subject: Re: SRP Response: Price Process: Info Room - SN-02 Request

CAUTION: This email originated from outside the organization
Beware of suspicious links, files, or requests. When in doubt report as phishing.

Ashleigh, when I view the file SN QU12 Request 2 - Production Portfolio, 02-04-25.pdf on secureshare, it is only 1 page long and is an email with a header of this:

From: CCSNormal - Dept ID
Sent: Fri 11/1/2024 9:56:23 PM
Subject: KB Feedback Received - PRICE PLAN

Are you saying that there is only one email on the topic of price plan cost comparison, bill comparison, bill cost, and the like over the past several years? In all of your emails? Also, please let me know what time period is covered.

On Tue, Feb 4, 2025 at 3:39 PM Ashleigh Hope <[REDACTED]> wrote:

Hi Mr. Neil – SRP's second production in response to your QU12 Request can now be accessed via SRP's Managed File Transfer site. To view the response, please click [this link](#) and follow the instructions below:

1. Click **Create Account**. (If you created an account in the past, you will not see a prompt to create a new one. Please skip to Step 5 and log in with your previously created credentials.)
2. Enter your email address and desired password.
3. Click **Create Account**. (A confirmation email will be sent to the email address you entered.)
4. Open the confirmation email and click **Activate Account**. (You will be redirected to the SRP Managed File Transfer site.)

5. Log in to the site with your email address and password.
6. Download the file(s) to your desktop.
7. When you are finished, log out.

Please note: The files will be available for approximately **2 weeks**, so please download what you need before then.

Best Regards,
Ashleigh Hope (she/her)

[REDACTED]

From: Steve Neil [REDACTED]
Sent: Thursday, January 30, 2025 3:38 PM
To: Ashleigh Hope [REDACTED]
Cc: John M Felty [REDACTED]; Melissa J Burger [REDACTED]; Lora F Hobaica [REDACTED]
Subject: Re: SRP Response: Price Process: Info Room - SN-02 Request

CAUTION: This email originated from outside the organization
Beware of suspicious links, files, or requests. When in doubt report as phishing.

Ashleigh, where are the emails about price plan cost comparison or the like? We talked about that aspect and that I didn't want to see emails from customers asking about the cost of various plans, just the SRP internal communications. I don't see any emails in the secureshare site. If I missed them, send some bread crumbs. :)

You'll recall our conversation on Thursday Jan 9 about this. You said you were querying something and seeing megabytes of results. I thought it was emails.

And you'll recall my original request back on 12/5/24:

"12. What has been written at SRP or written to SRP about price plan comparison and the like since the beginning of the prior price process in 2018? Please provide electronic copies of these communications."

When? Next Wednesday will be two whole months since my request, and not enough time in advance of board meetings considering this matter which begin tomorrow!

--Steve

On Fri, Jan 24, 2025 at 10:16 PM Steve Neil [REDACTED] wrote:

Thanks, Ashleigh. I will review over the weekend (I hope!).

I'm still waiting for a couple other parts of my 12/5 request about price plan cost comparison, and I restated those on 1/10 and received this response from your feedback system. I reformatted it a bit as your system makes one big run-on paragraph.

Can you or somebody get back to me by mid-week? The board meetings are coming up fast and SRP hasn't answered very many of my questions.

Thank you for submitting a question or concern regarding the pricing process. For reference, your submission confirmation number is **b5c8cc5f**.

Our team will carefully review your input and will follow up with answers to your questions, if any.

Here's what we have received from you:

This is a followup to "SRP Corporate Pricing Response to Public Comment #MI6435429" that I received 12-31.

I reask two of the questions I asked on 12-5:

Original question 7. Regarding the S5 statement in Sep 2023, "we have different price plan comparison tools and calculators online, and call center representatives are available", what are all the tools and calculators, both online for customers and only available to SRP employees, the tool or calculator name, the URL if available to customers, the customer types or classes available to, the date ranges the tool or calculators have been available, the time granularity of the data e.g. how many minutes, hours or days does the kWh data represent, the length of the period calculated e.g. in years, etc.? Sounds like a table would be the best way to provide this information.

SRP Response: Due to the meter programming requirements for rooftop solar, which are specific depending on bill options including Net Metering, Export, or Customer Generation, SRP does not currently have an online tool on its website for customers with solar to compare price plans. Non-solar residential customers, with more generic meter programs, receive a comparison message on their bill.

As you can see, I did not say a thing about "rooftop solar". And there is no response to my question.

Original question 9. The Blue Book's proposed adjustments will result in an increase in the number of plans available for a residential customer to choose from, and the plans offer a greater diversity in variables for the customer to consider. The adjustments will also result in a short timeframe of about 8 months for customers to choose a possible lower cost plan before 10 legacy plans are frozen from new participation and will no longer be an option they can choose. What is management's plan, in detail and including timeframes please, to assist customers in making an informed choice about the cost of the various plans?

SRP Response: If SRP's Board of Directors approves the price changes, SRP will publish those changes on its website within one business day after the Board's approval. SRP will also notify all customers of the changes, by mail and-or email, before the first billing under the new prices.

I'd like to give management another opportunity to address this question.

On Fri, Jan 24, 2025 at 4:00 PM Ashleigh Hope [REDACTED] wrote:

Dear Mr. Neil:

Thank you for your patience as I gathered records responsive to your December 5, 2024 request seeking "what has been written at SRP or written to SRP about price plan comparison and the like since the beginning of the prior price process in 2018? Please provide electronic copies of these communications" (the "Request"). As I understand, you spoke with my supervisor, Katy Heth, last week at the Price Process Interviews and interviewed SRP's Senior Director of Customer Services, Glen Trasdahl, who answered many of your questions on the topic of price plan comparisons that are the subject of this Request. SRP's response to the Request can now be accessed via SRP's Managed File Transfer site. To view the response, please click [this link](#) and follow the instructions below:

1. Click **Create Account**. (If you created an account in the past, you will not see a prompt to create a new one. Please log in with your previously created credentials.)
2. Enter your email address and desired password.
3. Click **Create Account**. (A confirmation email will be sent to the email address you entered.)
4. Open the confirmation email and click **Activate Account**. (You will be redirected to the SRP Managed File Transfer site.)
5. Log in to the site using your new credentials.
6. Download the relevant files to your desktop.
7. When you are finished, log out.

Please note: The files will be available for approximately **2 weeks**, so please download what you need before then.

Please let me know if these records do not meet your needs and we can revise the search terms and try again. I hope you find this content helpful. Thank you again for your patience.

Best Regards,

Ashleigh Hope (she/her)

[Attorney – Litigation](#)

SRP | Legal Services | PAB381

P.O. Box 52025, Phoenix, AZ 85072-2025
[REDACTED]

Confidentiality Notice

This message and any accompanying attachments may contain confidential and/or privileged information. The message and attachments should be read and retained by intended recipients only. If you received this message in error, please notify the sender immediately and delete the message and any attachments.

CUSTOMER OPERATIONS PROJECT STATUS REPORT



MDMS REPLACEMENT [\(hyperlink to project site\)](#)

[Link to Customer Operations Strategic Portfolio Dashboard](#)

REPORT DATE	NEXT REPORT DATE	CURRENT PHASE	IMPLEMENTATION DATE	STATUS
08/09/2024	08/16/2024	Testing	09/19/2024 ☒ Approved ☐ Estimated	GREEN

PROJECT SPONSOR	PROCESS OWNER	TECHNOLOGY SPONSOR	PROJECT MANAGER
Sheenam Arora	Justin Fish	Nate Johnson	Amy Erwin

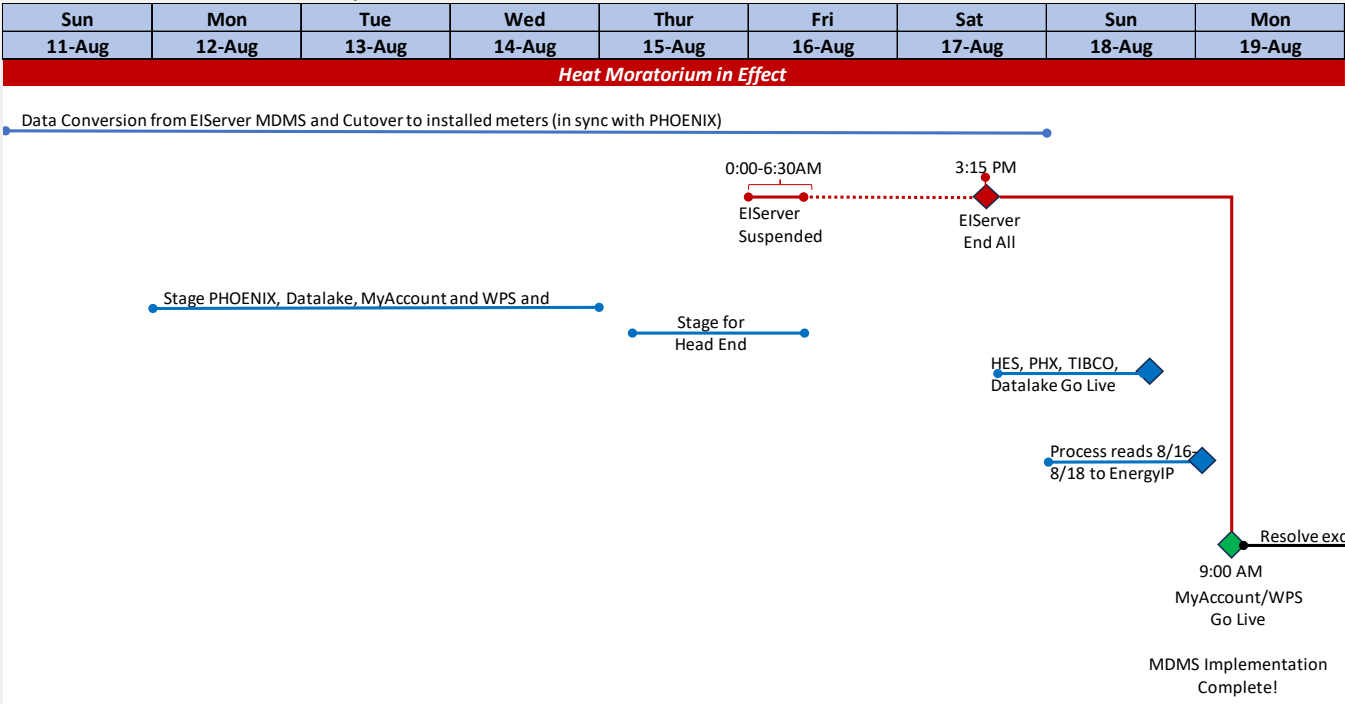
SCOPE

Implement EnergyIP Meter Data Management System (MDMS) on premise to replace SRP’s existing MDMS, its functionality and integration. Provide for the following, implementing as soon as possible and prior to the end of current MDMS production maintenance and support (December 1, 2024):

- Improve performance for current meter volume (1.2M meters) and future growth (1.5M+ meters)
- Provide for MDMS high availability, disaster recovery and data backup.
- Ensure solution can be easily maintained and supported.
- Develop strong partnership with TRC (reseller and integration partner) and Siemens.
- Complete prior to Customer Modernization development/implementation

SCHEDULE

Data conversion for implementation will begin this Sunday, August 11, 2024. Pending a final ‘go’ decision from leadership on Monday, August 12, the MDMS replacement implementation will continue as pictured below to go live on Monday, August 19, 2024. Note that reads processing and orders automation for Honeywell/Elster meters via the EIServer MDMS will be suspended at start of day Friday, August 16 and is planned to resume at 6:30 AM, until all EIServer processing is fully suspended around 3:15PM Saturday.



BUDGET PERFORMANCE

BUDGET SIZING	Large: Over \$1M	Projected financial performance is projected to be +\$200K over budget (may be offset by deferred purchases)
---------------	------------------	--

PROGRESS SUMMARY

ACCOMPLISHMENTS

- Results from Mock Cutover 2 (dress rehearsal) were reviewed and incorporated for go live planning.
- Planning and preparation for the MDMS Replacement implementation and go-live was completed and change requests submitted.
- Capacity testing was executed infrastructure team and TRC to gather metrics to assess at what point of growth the MDMS configuration and infrastructure may approach its current capacity and need expansion.

NEXT STEPS

- Oracle team will apply changes to prepare production environment for go live.
- Data conversion from EIServer to EnergyIP will be initiated.
- Datalake team to apply a 'pause' in picking up data transfer files with register, interval and event data for import to the Snowflake to address four incomplete files found during mock 2 implementation.
- Final preparation for SRP implementation work and communications.
- Implement EnergyIP to production together with PHOENIX, TIBCO, Datalake, MyAccount and Water Pump Systems beginning late August 15 to enable Go-Live
- Establish post go live monitoring.

DECISIONS

DESCRIPTION	STATUS	ASSIGNED TO
Final Implementation 'Go' Decision	Pending	Leadership

RISKS AND ISSUES ([hyperlink to ALL Project Risks and Issues log](#))

TYPE	ITEM	IMPACT & MITIGATION
Issue	Analytics Data Platform project (APDM) migrating Hadoop datalake to Snowflake does not yet have solution in place to maintain Smart Alerts and Price Plan Comparison functionality working in Snowflake datalake as it does today in the Hadoop datalake.	Potential for Smart Alerts and Price Plan Comparison tool to not function with MDMS Replacement implements and starts sending reads/usage data to Snowflake rather than Hadoop. APDM update to provide leadership an update on Monday, August 12.
Issue	Datalake reconciliation of 3 days of read data pushed during mock 2 has not been successfully reconciled for register reads. Issue thought to be related to four files picked up by datalake integration before file writing was complete.	Impact: Snowflake may not receive 100% of the data that is processed and provided by the new EnergyIP MDMS. Mitigation: APDM project will establish for a 'pause' in data pickup process before Snowflake processing. Monitoring to be established for the first weeks following go live.

TESTING UPDATE

Resourced: 100%

- Capacity Testing, which will provide metrics when existing MDMS infrastructure sizing nears capacity, will be conducted next week.
- Brief datalake integration test may be conducted early next week to validate datalake 'pause' in integration process.

MEMORANDUM

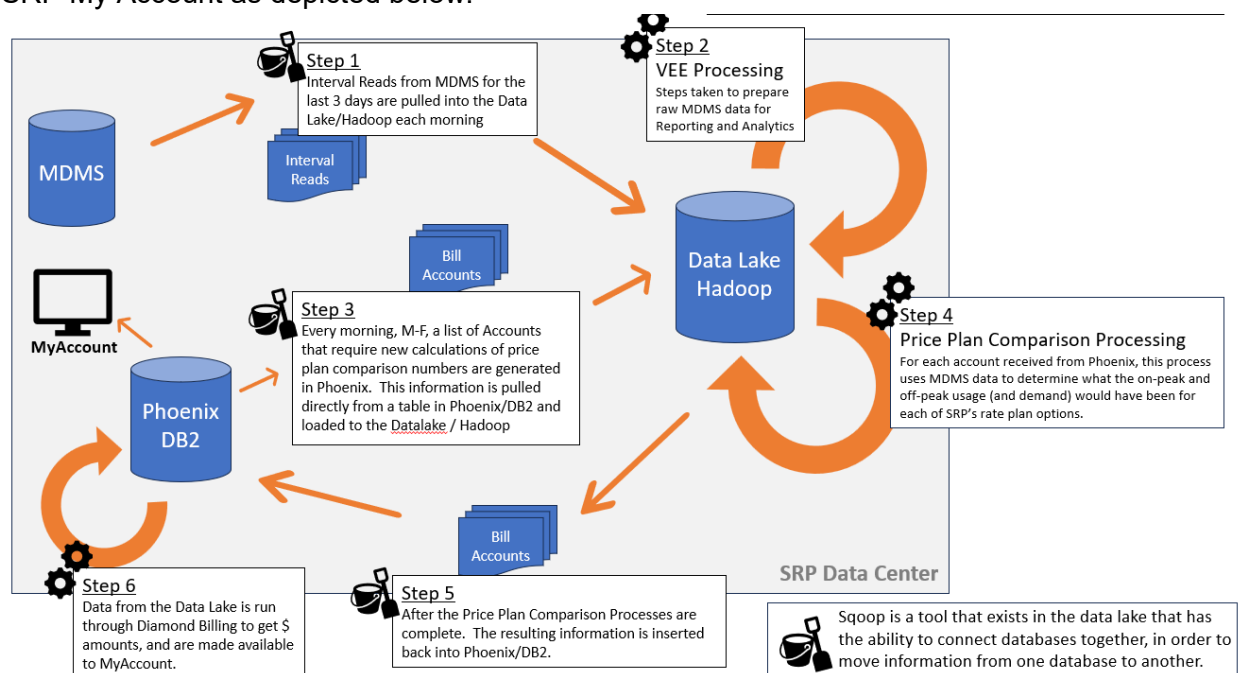
February 17, 2025

Summary of decision to decommission SRP's Price Plan Comparison display in summer 2024:

Background:

SRP developed and implemented a price plan comparison display for residential, non-solar customers in January 2020. Functionality for some residential rooftop solar customers was added to this display in July 2020. The price plan comparison display was live on SRP's MyAccount web portal until August 2024. The display worked by using customers' actual meter data measured in 15-minute intervals to calculate energy costs for solar and non-solar customers. The use of actual metered values resulted in accurate calculations in the comparisons generated by the display, assuming no increase, decrease or shifting of usage. Only customers with 12 months of history on the same price plan could view the display.

Various technical systems were involved in supporting the price plan comparison display on SRP My Account as depicted below:



Problem Statement:

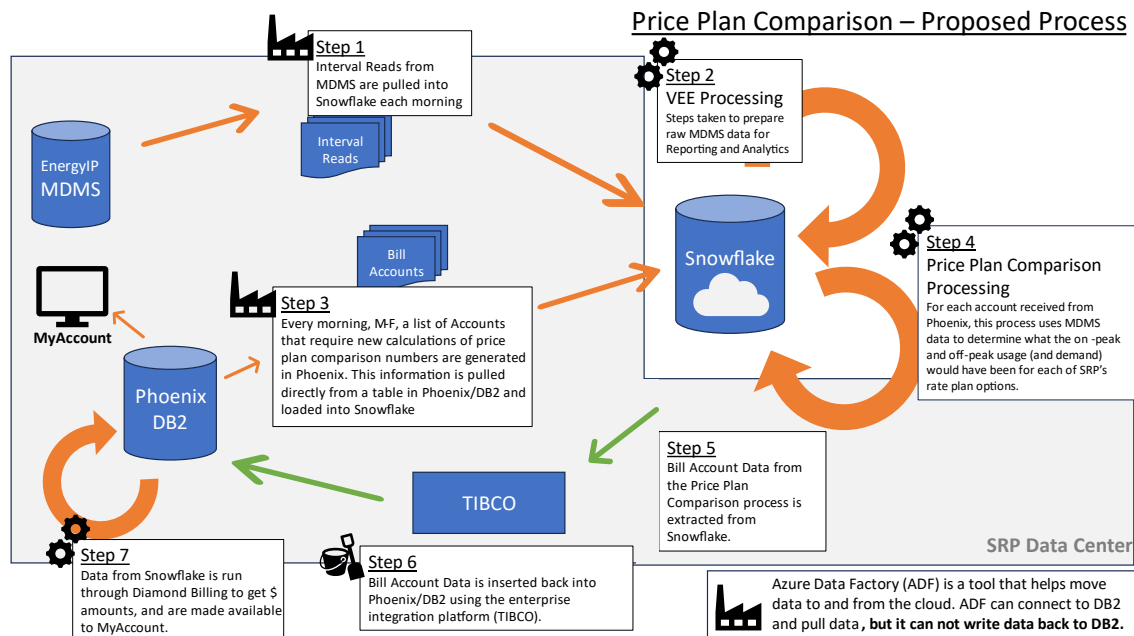
During the Summer of 2024, several significant IT projects were underway, including the migration from Hadoop, SRP's on-premise data lake, to Snowflake; the transition to a new Meter Data Management System (MDMS); launch of Customer Modernization and the

preparation for the Pricing process. These are critical systems and efforts related to the price plan comparison display.

The new MDMS system transitioned from a one-time nightly table replication to transactional queue processing. Seventeen tables were replicated and replaced by a file system pushed over several times an hour. Snowflake was migrated to the cloud, and additional controls were implemented to secure the data. The new XML format was condensed, and new data rules were created to extract the data as well as pull data from other systems to ensure a complete dataset. Dependency on final system configuration prevented work being done ahead of time. Additionally, a limitation was discovered when attempting to write or insert data into the Phoenix DB2 system. This affected the availability of price plan comparison at the MDMS project go-live in August 2024.

Potential design consideration and the associated timeline:

The technical team proposed a potential solution to the problem described above. The code development estimate for this solution would take 2 months. Given the complexity of the technical changes and the display's visibility, in-depth testing would be required to ensure the accuracy of the data presented to customers. Before the formal testing could begin, a 3-month data conversion process would be needed to test the PHOENIX system tables that would be used to populate My Account. In addition, 1-month effort would be required to plan and write the test cases. Then, end to end functional and user testing of the price plan comparison display would take at least 3 months with dedicated experts committed to this testing. A lot of these experts were focused on the Customer Modernization effort and gathering requirements for technical system changes in anticipation of the pricing process. Therefore, the overall development and testing work effort was estimated to take approximately 8 months.



The plan to decommission PPC in November 2025:

With the Pricing process, many existing price plans will be frozen and no longer available to customers. To apply the new price plans to historical data, MDMS data would need to be moved and allocated to the appropriate Time-of-Day (TOD) hour buckets for each price plan. The accuracy of the data must be reviewed, and each price plan tested for all eligible residential customers. This is a significant testing effort that would need to be scoped and estimated and would require dedicated testing resources.

The value of the price plan comparison display was estimated to be limited as we are changing the hours of the TOD rates. It was seen as problematic to use a customer's usage pattern under a coming frozen plan to compare with new plan with such different TOD hour buckets, with no ability to interact with the tool to look at new scenarios.

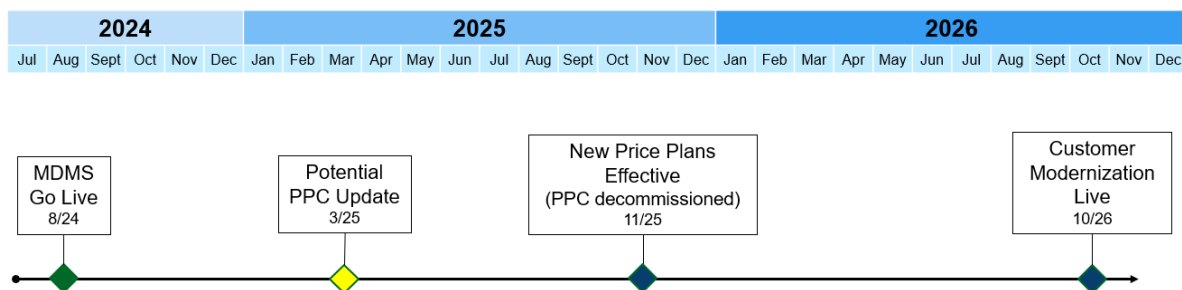
An additional consideration was the fact that the implementation of the new Customer System and Web Portal did not include a price plan display or tool. To include that in scope for Customer Modernization would be a customization to SAP that would be sizable and potentially delay or prolong the project's implementation. In addition, with the transition from scalar to Interval Data Reads (IDR), the availability of the new billing determinates for all rates would be limited to about a month of data. Our recommendation was to consider PPC as a post-go-live enhancement effective 12 months post install to ensure the required history of the new price plans and 12 months of needed IDR data history.

Value:

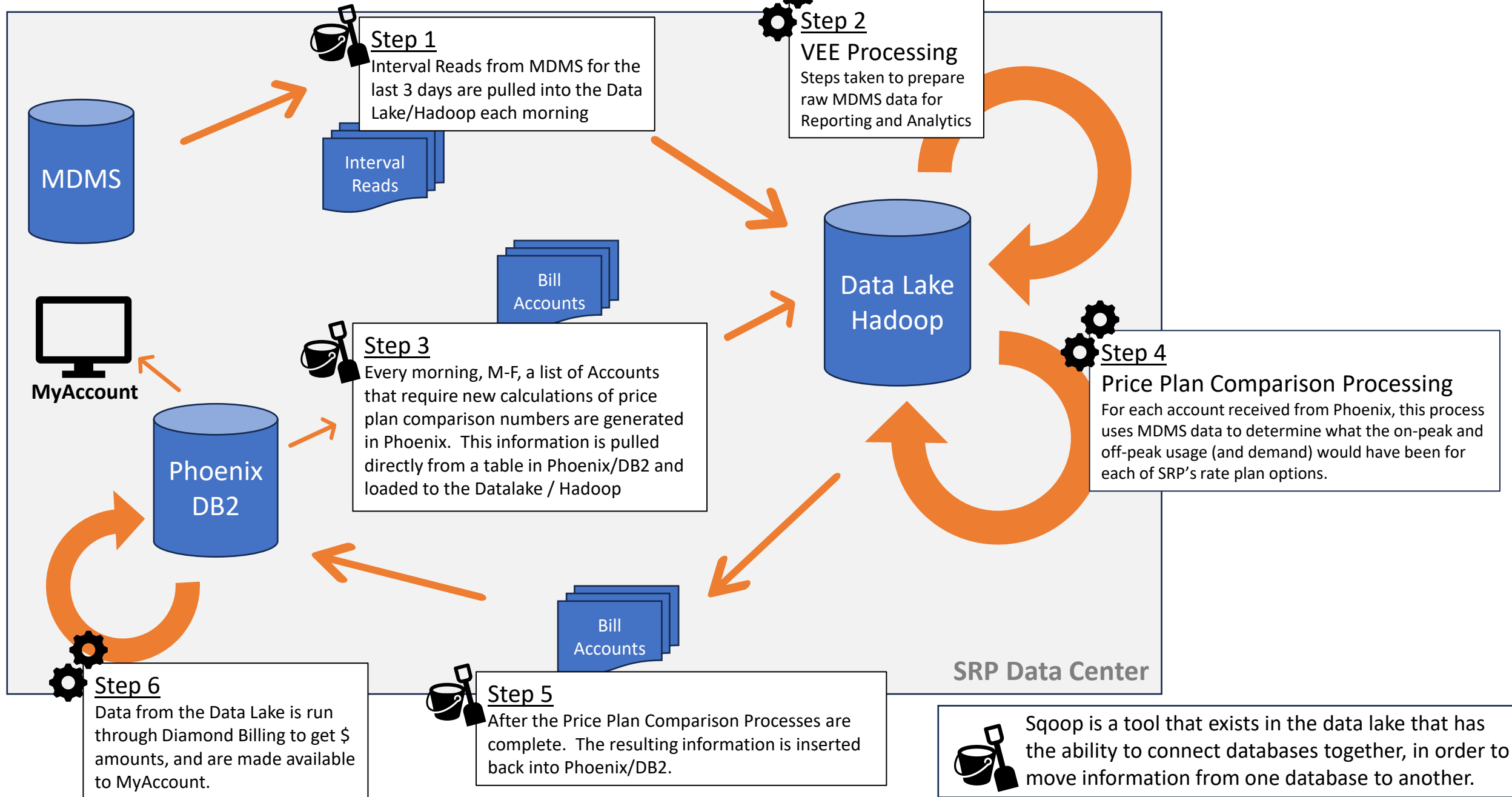
The potential low action taken as a result of the display. From January 1, 2024, to August 31, 2024, the price plan comparison page received 74,122 visits. Of those 74,122 visits, only 181 people (.2% of visitors) then took action to go to the Change Price Plan page.

Summary:

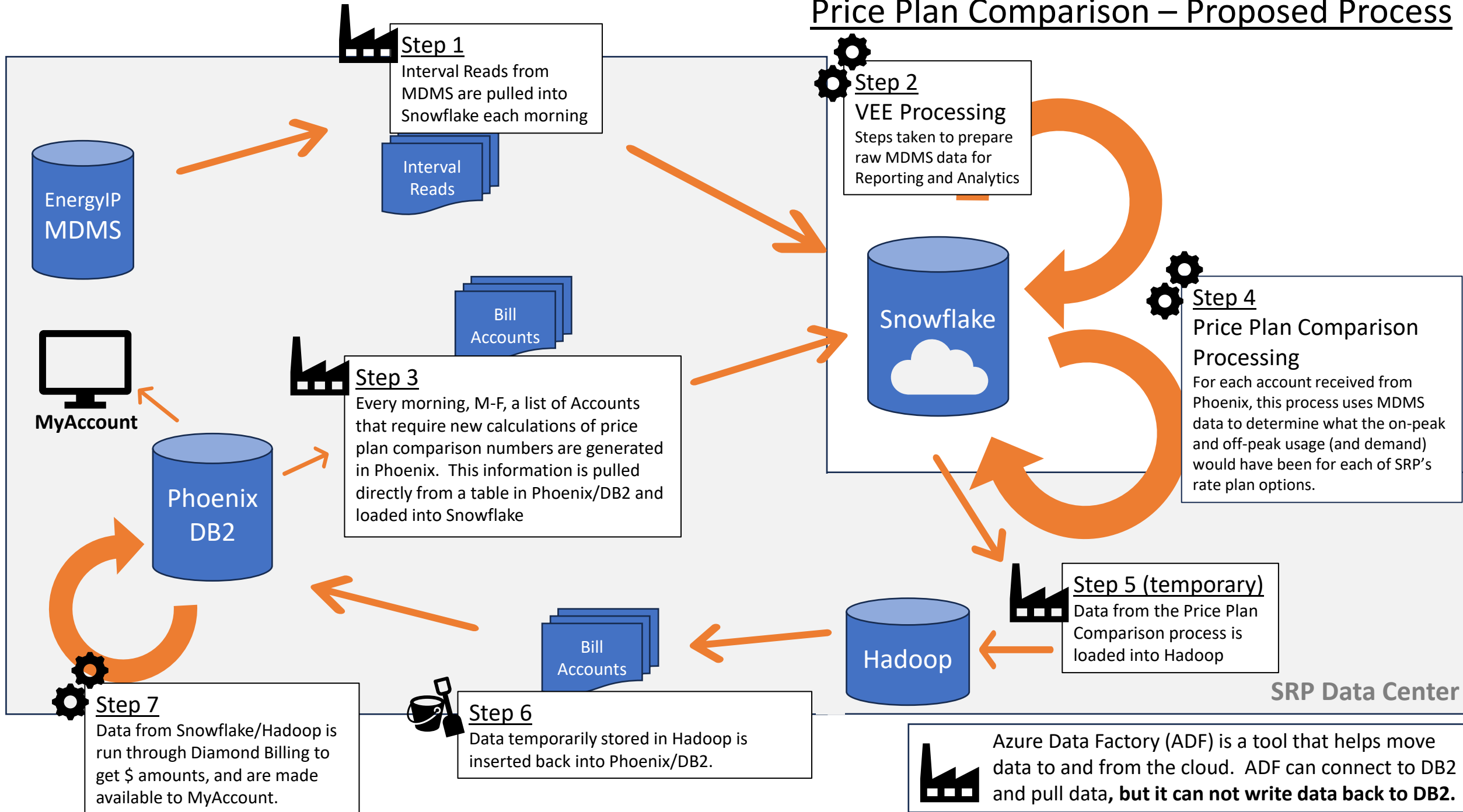
Because of the limited value of the price plan display, and the planned decommission in 2025, we decided to not spend the time and money to re-code and re-test the current tool in 2024.



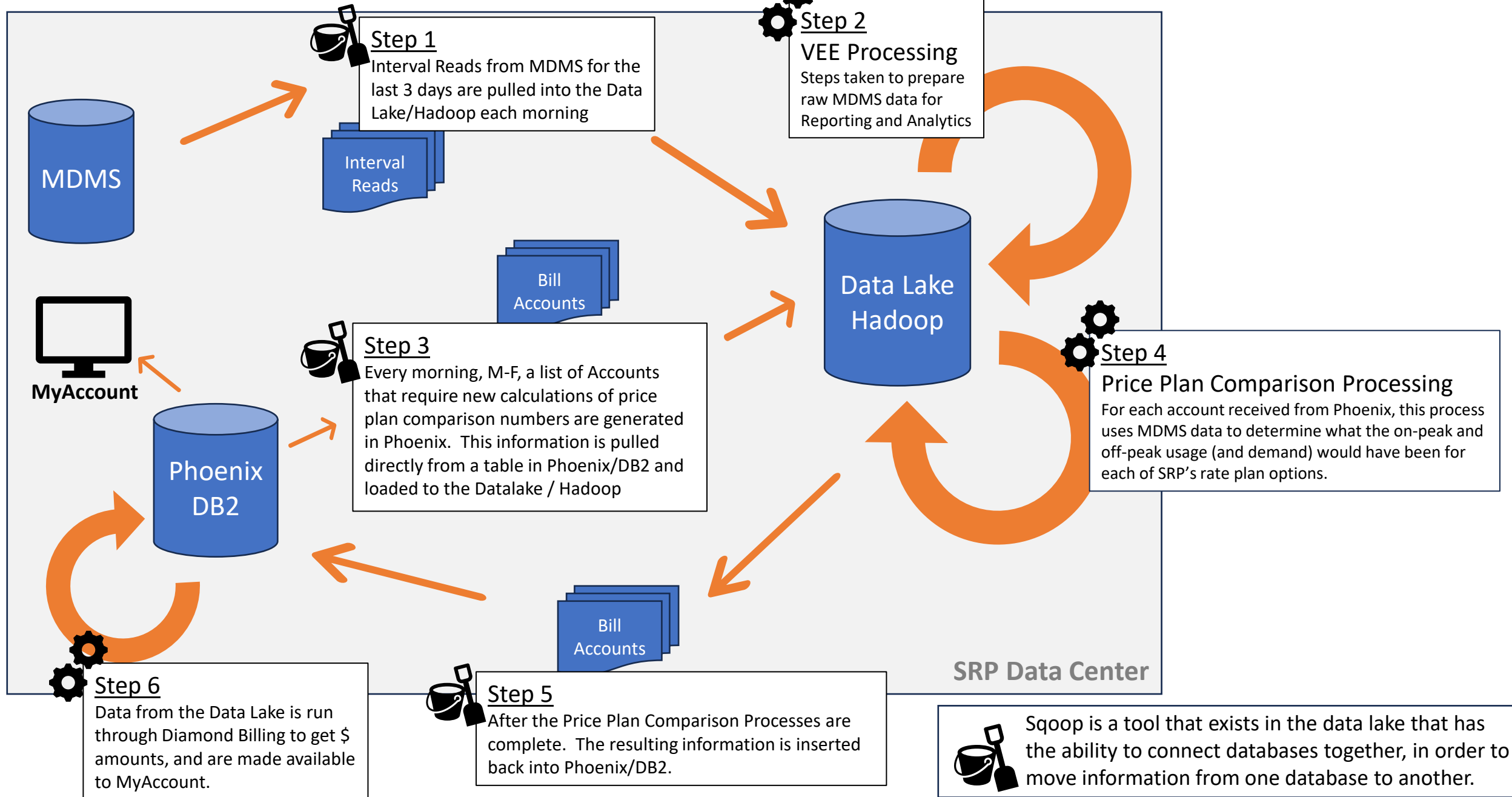
Price Plan Comparison – Current Process



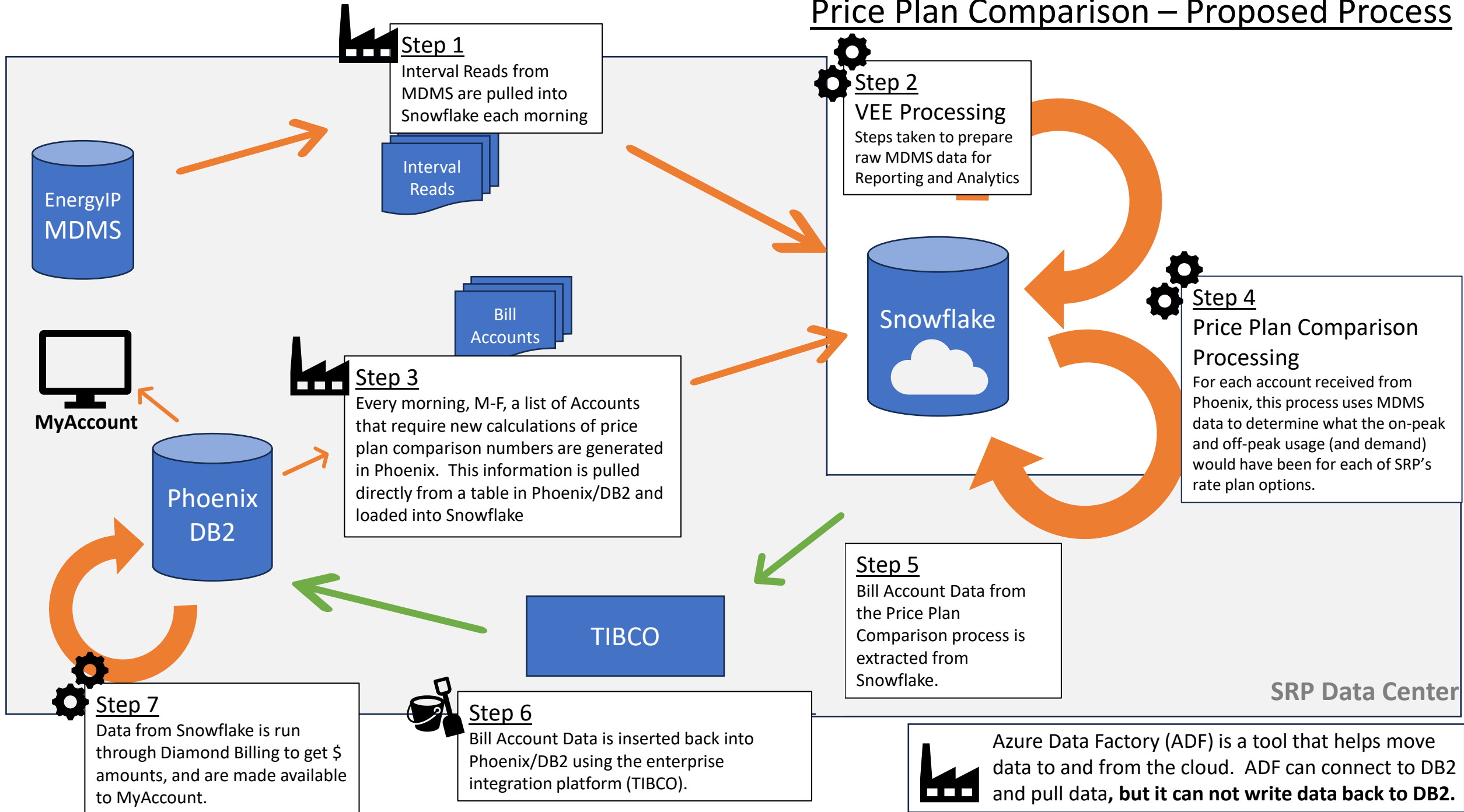
Price Plan Comparison – Proposed Process



Price Plan Comparison – Current Process



Price Plan Comparison – Proposed Process



SRP Public Price Process Responses for 0b454866

Name: Steve Neil

Record Number: 0b454866
Delivery Method: Digital Submission
Received Date: 12/9/2024
Comment:

This request for information is a followon to my request of December 2 that you have coded as Public Comment #32346cdd. To restate for clarity, this is about the unexplained differences between the proposed E-28 price plan and the current E-28 pilot price plan. Your reply is appreciated, but it didn't address the substantive differences in the winter kWh pricing of the E-28 Pilot Price Plan and the proposed E-28 to be made into a standard price plan i.e. the on-peak kWh price raised 30%, the off-peak kWh price raised 18%, and the super off-peak price lowered 27%. The E-28 section of the Blue Book does not have a Customer Bill Impacts section, so it seems appropriate to request detail on the bill impact on a variety of usage profiles such as 20% on-peak, 40% off-peak, and 40% super off-peak, and say another 5 percentage mixes that you deem to be typical. And for the monthly service charge, stating the percentage in each tier of your residential customer base, and the resulting average monthly service charge. And for these 6 time-of-use mixes, the percentage change in the bill \$\$\$. I understand that a number of customers in each of the 6 mixes is not practical for this example, and future participation in E-28 cannot be predicted. I look forward to studying it! Your response nor the Blue Book give any explanation for the proposed changes in winter on-peak hours, the pivot from the current plan's statement that "There are no on-peak hours from November 1 through April 30" to an on-peak price that is proposed to be 30% higher than the pilot's off-peak price. Please explain in detail. A change you did not talk about in your list in your response is that you added an exported kWh monetary credit for on-site generation. You could have otherwise adopted the monthly net metering arrangement used in the current E-27 price plan. What was the rationale for choosing kWh monetary credit rather than monthly net metering? And this explanation will need detailed examples showing why monthly net metering was unacceptable to management, such examples I'm sure would have already been created in the due diligence of choosing one approach over the other. And a simple one - please explain a bit about how your billing cycles are defined and enough examples to show all the possible start & end dates that could constitute a "November billing cycle". This will be very important for customers to know the

deadlines of when will be the last chance to choose a price plan that is to be frozen in 2025, and when will be the last chance to choose a plan in 2029 before being sunsetted from a frozen plan to the default transition.

Response Subject: SRP Corporate Pricing Response to Public Comment #0b454866

Response Attachments: SRP Management Response to Steve Neil's Second Request for Information_SN02.pdf;

*To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #0b454866

Response:

Please see attachment "SRP Management Response to Steve Neil's Second Request for Information_SN02".

**SRP Management Response to
Steve Neil's Second Request for Information Regarding
SRP's Proposed Changes to its Electric Rate Schedules**

1. This request for information is a follow on to my request of December 2 that you have coded as Public Comment #32346cdd. To restate for clarity, this is about the unexplained differences between the proposed E-28 price plan and the current E-28 pilot price plan. Your reply is appreciated, but it didn't address the substantive differences in the winter kWh pricing of the E-28 Pilot Price Plan and the proposed E-28 to be made into a standard price plan i.e. the on-peak kWh price raised 30%, the off-peak kWh price raised 18%, and the super off-peak price lowered 27%. The E-28 section of the Blue Book does not have a Customer Bill Impacts section, so it seems appropriate to request detail on the bill impact on a variety of usage profiles such as 20% on-peak, 40% off-peak, and 40% super off-peak, and say another 5 percentage mixes that you deem to be typical.

SRP Response:

The proposal includes ending the existing E-28 pilot and replacing it with a new price plan, also called E-28. Because it is a new price plan, the proposal does not include bill impacts or summary of the changes.

The current and proposed prices were provided as a courtesy for parties interested in the price process to see the pilot E-28 prices and the proposed standard E-28 prices. As hours have expanded in every season, the prices are not intended for a 1:1 comparison.

No percentage change in bills was calculated for existing E-28 pilot customers who could be moved to the new E-28 price plan.

As reference, here is the percent of usage by period that was used in the design of the proposed new E-28 rate:

Season	On-Peak kWh	Off-Peak kWh	Super Off-Peak kWh
Summer	11.8%	57.0%	31.2%
Peak	11.4%	57.5%	31.1%
Winter	10.5%	59.8%	29.7%

2. And for the monthly service charge, stating the percentage in each tier of your residential customer base, and the resulting average monthly service charge.

SRP Response:

Per the Cost Allocation Study, this is the percentage of each tier and the resulting proposed average monthly service charge (MSC):

Tier	Percent of residential customers	MSC
1	20.3%	\$20.00
2	76.6%	\$30.00
3	3.1%	\$40.00

The weighted average MSC of the above group is \$28.28.

The Cost Allocation Study MSC percentages are based on actual customers who have 12 months of usage data under a price plan. Price plan impacts include only customers with 12 months of usage history, to ensure seasonal price changes are reflected accurately.

When we include data that includes all customers for a single month, such as the November 2024 billing cycle customers, the percentage in each tier is as follows:

Tier	Percent of residential customers	MSC
1	28.2%	\$20.00
2	68.4%	\$30.00
3	3.4%	\$40.00

The weighted average MSC of the above group is \$27.51.

3. And for these 6 time-of-use mixes, the percentage change in the bill \$. I understand that a number of customers in each of the 6 mixes is not practical for this example, and future participation in E-28 cannot be predicted.

SRP Response:

Please see response to Question 1.

4. Your response nor the Blue Book give any explanation for the proposed changes in winter on-peak hours, the pivot from the current plan's statement that "There are no on-peak hours from November 1 through April 30" to an on-peak price that is proposed to be 30% higher than the pilot's off-peak price. Please explain in detail.

SRP Response:

Customer feedback typically indicates a preference that peak hours are consistent year-round. In the interest of simplicity, the proposed new E-28 rate will have year-round on-peak hours. Marginal cost differences between hours form the basis for the creation of time-of-use periods.

5. What was the rationale for choosing kWh monetary credit rather than monthly net metering? And this explanation will need detailed examples showing why monthly net metering was unacceptable to management, such examples I'm sure would have already been created in the due diligence of choosing one approach over the other.

SRP Response:

For E-15 and E-27, the energy charge was set very close to the marginal cost of energy, with the demand charge collecting the demand-related costs. For other price plans, the energy charge collects both energy-related and demand-related costs.

The demand charge in the proposed E-16 price plan does not collect the entire demand-related costs associated with service. The energy charge collects the remaining demand-related costs. The proposed E-28 energy charge collects the entirety of both energy and demand-related costs.

To have net metering on either E-16 or E-28 would require energy to again be set at the marginal cost price. To collect the remaining demand-related costs could include designs such as a much higher demand charge or a higher monthly service charge.

As proposed, the export credit for E-16 and E-28 will be adjusted every fiscal year based on the actual 3-year average of the CAISO ELAP price during rooftop solar export hours, which is SRP's avoided cost for generation and export that occurs during the applicable hours.

Regardless of the mechanism of crediting for excess solar generation that is exported to the grid, the customer's bill savings will be highest when they use their own solar energy on-site, including with the use of customer-owned battery systems.

6. And a simple one - please explain a bit about how your billing cycles are defined and enough examples to show all the possible start & end dates that could constitute a "November billing cycle".

SRP Response:

The billing cycle month is determined by the ending monthly scheduled read date for the cycle. The November billing cycle has scheduled read dates of November 1 through November 30. For example, 10-2-24 through 11-1-24, 10-15-24 through 11-14-24 and 10-29-24 through 11-28-24 are all considered November bill cycles.

SRP Public Price Process

Responses from: 2/20/2025

Name: Laura

Record Number: 94d5ddcd
Delivery Method: Digital Submission
Received Date: 12/31/2024

Comment:

Please tell us who pays for the costs of attracting "large" customers to SRP territory. How much expenses did SRP incur in the last 12 months for attracting these "large" customers in terms of hosting them to events, concerts, games, meals? And how are these costs allocated? Who pays for them?

Response Subject: SRP Corporate Pricing Response to Public Comment #94d5ddcd

Response:

Laura,

Arizona and SRP's reputation for reliable, affordable power draws in large companies to the area. The SRP Economic Development team helps SRP to proactively plan for future growth and serve customers located within SRP's electric service territory.

SRP coordinates with the Arizona Commerce Authority, Greater Phoenix Economic Council, and 15 municipalities in SRP's service territory to support economic development to create high-value opportunities for Valley residents. The team focuses on six key industries: Biosciences and Healthcare, Advanced Manufacturing, Aerospace/Aviation, Business Services & IT, Electric & Autonomous Vehicles, and Energy Storage. The team's efforts contributed to 23 new projects and over 7,500 new jobs created last fiscal year. The department's success is measured by job creation and capital investment, and not by power system growth or number of large customers.

About 5% of SRP's Economic Development budget goes to business attraction hosting activities, which are focused on high-benefit engagements that result in job creation and strategic partnerships for the region. The total spent on those activities in the last fiscal year was \$50,000. Those dollars are allocated via corporate overheads, but overheads are all added together and not individually allocated to different rate classes.

Name: Tammy Bosse

Record Number: MI6987958
Delivery Method: Other
Received Date: 1/31/2025
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

Response Subject: SRP Corporate Pricing Response to Public Comment
#MI6987958

Response:

Thanks for coming to the Board meeting. We appreciate your comments.

The current export rate is 2.81 cents per kWh. It was approved during SRP's last Pricing Process (in 2019) and is reflective of the cost at the time of new utility scale solar generation, plus an increase for line and transformation losses associated with the transmission and distribution systems to reflect the local nature of the generation.

The proposed export credit is 3.45 cents per kWh, computed by averaging the three prior calendar years' hourly market prices weighted by the average export in each hour, plus an increase for line and transformation losses. As proposed, the export credit would be updated annually.

Both methods approximate what SRP pays for wholesale energy during hours of solar export.

The Cost Allocation Study (CAS) accounts for the full value of the export, including a reduction in the allocation of the fixed generation capacity, transmission, and capacity-related purchased power agreements directly proportional to the amount of export in the various peak hours driving those costs. The results of this can be seen in the CAS, Schedule 8, lines 21 (Transmission), 22 (Ancillary Services 1-2), 24 (Generation), 25 (FPPAM-Demand), 26 (FPPAM-Energy), and 27 (FPPAM-Balance). Note that these cost totals also are reduced because of DER energy used on-site. Lines 20 and 23 are computed using only DER energy used on-site, and not excess energy exported to the grid. Lines 15-19 are fixed and are not reduced because of on-site or excess DER energy.

Note that CAS uses the term “net kWh” when exported energy is included. Net kWh is computed as energy SRP delivers to the customer less energy the customer exports to SRP. You can see that the cost totals in Schedule 8 take into account net kWh by tracing back how each allocator was calculated:

- Transmission – The 4CP allocator used on Schedule 5a Line #10 measures the 4CP with the customer’s net kW
- Ancillary Services 1-2 – The 4CP allocator used on Schedule 5a line #3 measures the 4CP with the customer’s net kW
- Generation – The class allocation of LOLP used to calculate the “Peak” portion of the Peak and Average allocator uses net kW, see Schedule 5g line # 8
- FPPAM-Demand – the allocation of demand related FPPAM costs uses LOLP-weighted Net Peaks as seen on Schedule 5a line # 21
- FPPAM-Energy – uses a net kWh number as seen on schedule 5e line #13
- FPPAM-Balance – uses a net kWh number to allocate associated costs as see on schedule 5e line #3

Management also addressed these points in the presentation to the SRP Board on February 11th. You can watch the recording online starting around 03:09:00 until around 03:24:40.

In general, SRP does not provide incentives for specific technologies in our Price Plans because we price based on our costs. When a technology aligns with SRP objectives and SRP offers incentives, it is typically done so through Customer Programs.

The savings on a customer’s SRP bill are unrelated to the cost of third-party equipment, such as solar panels or batteries. Whether a customer’s SRP bill savings exceed the cost of their solar panels or battery will depend on a variety of factors, including how the panels perform and what the customer paid for them.

Name: Tammy Bosse

Record Number: 7d896426
Delivery Method: Digital Submission
Received Date: 2/6/2025

Comment:

SRP - SOLAR win-win solutions. SRP benefits greatly from the low "wholesale" solar buy back rate but the management presentation indicated that SRP is losing money on solar customers. I question whether that is accurate because it is not clear where SRP includes the profit that SRP benefits from when purchasing solar energy at an excessively LOW rate, much lower than the cost to generate energy elsewhere, while selling it back at full retail. Please clearly explain exactly where SRP calculates and integrates the INCOME - profit generated from the low buy back rate from solar generation in relation to the retail rate that energy is sold for. Thank you.

Response Subject: SRP Corporate Pricing Response to Public Comment
#7d896426

Response:

Tammy Bosse,

A response to this request was provided under MI6987958, which supersedes this request.

Name: Caryn Potter

Record Number: MI7024599
Delivery Method: Email to Corporate Secretary
Received Date: 2/10/2025
Attachments: FW_ Question on SRP's Monthly Service Charge Cost Categorization.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI7024599*

Comment:

A response request for additional information on SWEEP01.

1) Can you please provide the FERC Account Numbers SRP includes in the three customer retail components that make up the Monthly Service Charge? Specifically, SWEEP would like to understand which FERC Accounts are included in the Billing and Customer Service, Meter, and Distribution Facilities Customer Charges and if any other Retail Components would be included in the total Monthly Service Charge as proposed.

2) Please clarify the discrepancy between the total annual costs recovered through the Monthly Service Charge for the E-23 Price Plan in two different sources: **\$251,851,307.00** in the CAS Schedule 9 and **\$129,827,460.00** in the Phase 2 Revenue Model. What accounts for this difference?

Both questions are in reference to the following SRP Datasets received by SWEEP:

- 2025 Cost Allocation Study Schedule 9
- FP2025 Phase 2 Revenue Model

Response Subject: SRP Corporate Pricing Response to Public Comment #MI7024599

Response Attachments: Distribution - Pricing Study
Grouping_SWEEP01_S2.xlsx; Customer Systems Study -
FP25_Links_SWEEP01_S2.xlsx; SRP Management
Response to SWEEP01_S2 Request for
Information_SWEEP01_S2.pdf;

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI7024599*

Response:

Hi Caryn,

Please see SRP Management Response to SWEEP01_S2 Request for Information for responses attached.

**SRP Management Response to
SWEEP01 Second Supplemental Request for Information Regarding
SRP's Proposed Changes to its Electric Rate Schedules**

Both questions are in reference to the following SRP Datasets received by SWEEP:

- 2025 Cost Allocation Study Schedule 9
- FP2025 Phase 2 Revenue Model

1. Can you please provide the FERC Account Numbers SRP includes in the three customer retail components that make up the Monthly Service Charge? Specifically, SWEEP would like to understand which FERC Accounts are included in the Billing and Customer Service, Meter, and Distribution Facilities Customer Charges and if any other Retail Components would be included in the total Monthly Service Charge as proposed.

SRP Response:

Only a portion of the Billing and Customer Service, Meter, and Distribution Facilities costs are included in the Monthly Service Charge (MSC). Note that the proposed MSC levels of \$20/\$30/\$40 do not cover all Billing and Customer Service and Distribution Facilities costs and so some portions of those costs are recovered in the per kWh charges.

SRP does not currently use FERC Accounts for the Financial Planning process and budget on which the Cost Allocation Study and Price Process material is based (other than FPPAM). However, attached is the list of equipment that SRP considered Distribution Facilities and Distribution Delivery, which was the basis for the determination of what percent of the total Distribution depreciation, O&M, and in lieu & ad valorem taxes was "facilities" and "delivery" (see the Cost Allocation Study Schedule 1 Calcs Line #36-50).

Also attached is the FP25 Customer Systems Study. The "CS Costs" tab contains a list of cost centers included in "Customer Systems" in the Financial Plan. Pricing works with Customer System staff to determine the percentage of dollars in each cost center that should be functionalized as Billing and Customer Service, Metering, Distribution, or System Benefits; as well as which customer classes on behalf of which the cost center is incurring costs. There is a "Long Description" column that describes what is included in each cost center.

2. Please clarify the discrepancy between the total annual costs recovered through the Monthly Service Charge for the E-23 Price Plan in two different sources: **\$251,851,307.00** in the CAS Schedule 9 and **\$129,827,460.00** in the Phase 2 Revenue Model. What accounts for this difference?

SRP Response:

The \$129.8M in the Revenue Model represents the total current amount of dollars collected in the MSC with current prices for E-23 customers. The \$251.8M in the CAS represents the proposed

dollars to be collected in the Billing and Customer Service, Meter, and Distribution Facilities functions. The CAS Schedule 9 doesn't calculate dollars for individual charges, it calculates dollars for individual functions. The dollars for a function may be collected in one or more different charges. For Current Revenues, the function totals for Billing and Customer Service (\$114.2M), Meter (\$13.2M), and Distribution Facilities (\$2.3M) match the Phase 2 Revenue Model MSC total because in current prices, distribution revenues collected in the MSC is labelled as "facilities" and distribution revenues collected in the per kWh charge is labeled as "delivery." The 2019 Pricing Process material noted that "[i]n some rate plans, part of the Distributed Facilities costs may be collected in the Distribution Delivery component." To avoid confusion, the 2025 Proposed Revenues and prices use more accurate labelling and the portion of the Billing and Customer Service and Distribution Facilities costs that are not recovered in the MSC and are instead recovered in the Per kWh Charge are labelled "Billing and Customer Service" and "Distribution Facilities."

Name: Tammy Bosse

Record Number: 4d8a5f5b
Delivery Method: Digital Submission
Received Date: 2/11/2025

Comment:

Thank you, SRP staff, for your service. As a community utility, we appreciate that you work to honor your responsibility 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 as a comprehensive approach to decision making. Clean energy is an essential component for both ESPECIALLY in Arizona SRP territory where our sunshine is one of our greatest assets (our oil and gas so to speak). Since 2014 when that SRP Board made one of the most harmful decisions in its history, 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. It is important to embrace solar as a valued PARTNER for low cost, clean energy, and not as an adversary. And it is important to give credit, where credit is due to solar. Treating solar customers differently with higher base fee for solar is an unfair discriminatory business practice. Period. It is also destructive to our community's overall economic and livability wellbeing. Solar helps reduce the burden on SRP's generation capacity expenses. It provides very low cost energy that SRP sells back for a good profit. It increases Arizona jobs which brings more SRP customers and more overall prosperity. It helps reduce carbon emissions making us all safer and healthier, and precious demands on our water supply. It helps improve our air quality. In short, Solar 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. But SRP keeps fighting and harming solar, instead of embracing it. Saying that solar costs SRP more than other customers is highly questionable. Where SRP is giving full credit for the income that SRP can generate from the price differential of 2.81 cents export rate and the retail rate that energy is sold for SRP should be incorporating the opportunities with solar, not taking ongoing actions to hurt solar. The current buyback rates are horribly low and SRP benefits excessively with that. Even paying a fair buyback, the cost of this power can be less than with using dirty energy so SRP can benefit along with the solar energy producer that is sent to SRP. SRP is unfairly taking advantage of solar customers and does not seem to incorporate this when talking about the "cost" of solar customers. These proposed solar increases do not seem to give credit to solar customers for relieving generation demand on SRP or for providing inexpensive "wholesale". Questions: -I am asking management to provide the calculations that factored in the cheap 2.81 cents rate that SRP pays

for buyback when it is sold back to others at a much higher retail rate. Where is the line item total for SRP's 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. Please look for opportunities to 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 if our solar jobs are lost because of punitive solar plans, then we all lose out economically and with a livable quality of life here. We are looking to you to live up to your role as stewards of this community as a community utility. Thank you very much for considering these concerns and opportunities.

Response Subject: SRP Corporate Pricing Response to Public Comment
#4d8a5f5b

Response:

Tammy Bosse,

A response to this request was provided under MI6987958, which supersedes this request.

Name: Tammy Bosse

Record Number: c57634c8

Delivery Method: Digital Submission

Received Date: 2/11/2025

Comment:

Where does SRP give credit to the low wholesale cost of energy that solar customers sell back to SRP as \$.281cents (proposed \$.34 cents)? SRP uses that energy for other customers that pay retail rate. What is SRP's wholesale costs for the energy generated elsewhere? I would like to request a records request regarding this information be sent to TammyBosse@BossProperties.com 3417 N. 60th St. Scottsdale, AZ 85251 I can be reached at 602-697-0003 Thank you.
Tammy Bosse

Response Subject: SRP Corporate Pricing Response to Public Comment
#c57634c8

Response:

Tammy Bosse,

A response to this request was provided under MI6987958, which supersedes this request. If you still require a records request, please contact CorporateSecretary@srpnet.com.

Name: Tammy Bosse

Record Number: 3838bb82
Delivery Method: Digital Submission
Received Date: 2/11/2025

Comment:

I was a real estate broker in 2014 when SRP's rate actions badly wounded solar. It is considered one of the worse utilities in the nation. Solar is a major economic strength and opportunity in SRP territory but SRP singlehandedly hurts this major economic opportunity that also helps SRP serve its responsibility as a community opportunity. All of SRP's customer base needs a livable community and jobs. SRP prospers more with more jobs, as well. Again, when calculating the cost to deliver service to solar customers are you giving solar credit for the low cost energy that solar provides for SRP to sell back to customers at retail rates? I have asked about this numerous times. Please respond. Thank you.

Response Subject: SRP Corporate Pricing Response to Public Comment
#3838bb82

Response:

Tammy Bosse,

A response to this request was provided under MI6987958, which supersedes this request.

Name: David Bender

Record Number: f0173bd8
Delivery Method: Digital Submission
Received Date: 2/18/2025

Comment:

This Fifth Set of questions continues numbering from prior sets. 25. Reference your response to prior request #20, which states that you applied “an estimate of the FY26 24 7 carbon-free energy value to SRP” from “SRP's market traders” to segregate an energy-related and demand-related amounts. Please identify the “FY26 24 7 carbon-free energy value to SRP” from “SRP's market traders” that was applied. Please provide the prices separated by the shortest time period for which such prices are available (such as hourly or sub-hourly prices if available).

Response Subject: SRP Corporate Pricing Response to Public Comment
#f0173bd8

Response:

Hi David,

Per SRP Management: SRP cannot provide the requested information, as it is confidential under A.R.S. § 30-805(B).

Name: Earl Schneider

Record Number: 3bb06622
Delivery Method: Digital Submission
Received Date: 2/20/2025

Comment:

Why do you charge us with solar more? We are producing power.back on the line , so it saves you more, why charge us more?

Response Subject: SRP Corporate Pricing Response to Public Comment #3bb06622

Response:

Earl Schneider,

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

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

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

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

At the same time, the proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and 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.

Name: Matthew Camp

Record Number: 2f6b3610
Delivery Method: Digital Submission
Received Date: 2/20/2025

Comment:

I am not very excited in the slightest that solar customers are taking the biggest hike in this change. I like my E-27 customer generation plan. Where my solar is purchased back at a 1:1 rate AS IT SHOULD BE. All of the future alternative price plans have a solar export rate LESS than the "super off peak" hours cost to the customer. This is very disappointing. What can be done to maintain this price plan?

Response Subject: SRP Corporate Pricing Response to Public Comment #2f6b3610

Response:

Hi Matthew,

Thanks for the comments and question.

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.

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

charge, or by excluding grid-related costs from the export rate (making the delivered energy price higher than the export credit).

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

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

SRP management's proposal aims to improve the experience for solar customers without shifting costs to others. The proposal simplifies the current portfolio of residential price plans by moving from six residential time-of-use plans and four solar price plans to two time-of-use plans (E-28 and E-16) that will be available to customers with and without solar. Solar customers on those new plans will have the same Monthly Service Charge, time-of-use hours, and 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.

Freezing a price plan means that it will no longer be offered to new customers. Under this proposal, to simplify pricing, certain existing time-of-use (TOU) price plans will be frozen as of the November 2025 billing cycle and will be eliminated by the November 2029 billing cycle, such as E-27 as you mention. If you are currently on one of those plans, you can stay on that plan until it's eliminated, or you can switch to a different plan sooner, starting in the November 2025 billing cycle to one of the two proposed new TOU options (E-16 and E-28).

SRP Public Price Process

Responses from: 2/21/2025

Name: David Bender

Record Number: MI7112575

Delivery Method: Other

Received Date: 2/21/2025

Attachments: Action needed, please upload new
comment_bender.pdf

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI7112575*

Comment:

A response request for additional information on EJ04, from 2/5/2025.

Response #23 . SRP will provide record(s) of bilateral purchases and the corresponding hourly EIM ELAP price from April 1, 2020, to present within 30 days.

Response Subject: SRP Corporate Pricing Response to Public Comment
#MI7112575

Response Attachments: Bilateral Purchase Prices_EJ04_S2.xlsx; Hourly
Elap_EJ04_S2.xlsx;

**To receive a copy of Attachments please
contact the Corporate Secretary's Office and Reference
Record #MI7112575*

Response:

Hi David,

See attachments for supplemental response to EJ04, question #23.
