

BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF AMENDMENTS)
TO THE ARKANSAS PUBLIC SERVICE)
COMMISSION’S RULES CONCERNING) DOCKET NO. 12-060-R
METER AGGREGATION AND COMBINED)
BILLING FOR NET-METERING CUSTOMERS)

COMMENTS OF
OKALHOMA GAS AND ELECTRIC COMPANY

Oklahoma Gas and Electric Company (“OG&E” or “Company”) hereby submits the following comments as requested by the Arkansas Public Service Commission (“APSC” or “Commission”) in Order No. 9 of this docket regarding the proposed Standard Net Metering Tariff, Appendix B of the Net Metering Rules (“NMRs”) submitted by the Commission General Staff (“Staff”) in compliance with Order No. 8.

OG&E believes that the Net Metering Tariff approved by the Commission for the Company, which will be based upon the revised Appendix B Standard Net Metering Tariff approved in this proceeding, is likely to be the initial source of information regarding net metering for customers and third parties. As such, OG&E would prefer to have flexibility to incorporate additional information in its tariff, which may include a reference to the Commission’s NMRs.

OG&E suggests that utilities should have the choice of offering a combined tariff or a separate residential, commercial and industrial tariff which would meet the requirements of each applicable rate class. Should OG&E or another utility choose to offer two tariffs, OG&E recommends the tariffs be titled, “Net Metering for 300 kW or

below” for non-residential customers and “Residential Net Metering for 25 kW or below” for residential customers.

The Company suggests the following changes be incorporated into Staff’s proposed Section 1.1:

To any residential customer with a generating capacity of not more than twenty-five (25) kW, or any other industrial or commercial customer with a generation capacity of not more than three hundred (300) kW, having a Net Metering facility that uses renewable resources; and can operate in parallel with the utilities existing transmission and distribution facilities and who takes service under standard rate schedule(s) or any variations thereof who has installed a net metering facility and signed a Standard Interconnection Agreement for Net Metering Facilities with the Utility. Such facilities must be located on the customer’s premise and intended primarily to offset some or all of the customer’s energy usage.

The language changes above are in accordance with the current NMRs. OG&E believes the revision provides the customer with criteria and clarity in the use of the Net Metering Tariff. However, in order for the tariff to be clearer to the customer and/or third parties OG&E believes a separate residential, industrial and commercial tariff would be more appropriate and would meet the requirements of each applicable rate class.

In Section 2.3 of the Staff proposed Net Metering tariff OG&E recommends incorporating the following changes:

If the kWh generated by the net-metering facility and fed back to the electric utility during the billing period exceed the kWh supplied by the electric utility to the net-metering customer during the applicable billing period, the utility shall credit the net-metering customer with any accumulated net excess generation in the next applicable billing period. For customers who take service under a time-differentiated rate, accumulated net excess generation shall be accumulated and credited separately by time period as defined by that time-differentiated rate.

OG&E has fully deployed its Automated Metering Infrastructure (AMI) and has an increasing subscription to time-differentiated rates [Time-of-Use (TOU) and Variable Peak Pricing (VPP)]. The AMI and time-differentiated rates allow the customer to maximize the benefits and production from the Net Metering facility and allows OG&E to accommodate the customer's rate preference. The inclusion of this language is important to provide recognition of on-peak generation by customers and describe how any accumulated net excess generation will be applied to the applicable billing period kWh.

Respectively submitted,

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ATTORNEYS FOR OKLAHOMA GAS
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CERTIFICATE OF SERVICE

I, Lawrence E. Chisenhall, Jr., hereby certify that a copy of the foregoing has been served on all parties of record via the PSC EFS this 25th day of September, 2013.

Lawrence E. Chisenhall, Jr.
Lawrence E. Chisenhall, Jr.