

**BEFORE THE  
ARKANSAS PUBLIC SERVICE COMMISSION**

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

**ARKANSAS ADVANCED ENERGY ASSOCIATION’S  
FINAL COMMENTS**

The Arkansas Advanced Energy Association (AAEA) and its 70 member companies express our appreciation to the Arkansas Public Service Commissioners (APSC) and the General Staff for your work and analyses of existing statutory authority and comments provided by the Joint Utilities, non-utility parties, and the Attorney General. AAEA desires to be on record in support of the proposed amendment to the Net Metering Rule (NMR) within Order 4 as the proposed rule change accomplishes AAEA’s three primary objectives as a party to Docket 12-060-R.

First, the amendment provides a thoughtful and orderly process for allowing additional meters to connect to a single net metering facility (NMF) or two or more NMFs. Second, the NMR amendment allows connection of meters on non-contiguous properties such as the example of the Rockmoore Public Water Authority provided in AAEA’s initial comments. And third, the amendment allows meters from different service classes to connect to a NMF.

AAEA’s only remaining and unresolved issue is the “restriction of meter aggregation to situations in which the customer owns the NMF.” AAEA will not pursue this issue further in Docket 12-060-R. Instead, we will consider other opportunities that may expand facility ownership to ratepayers that otherwise cannot access the benefits of net metering due to lack of

financial resources. Other states with meter aggregation have made possible different types of financing and ownership arrangements that have contributed to each state's economic development and job growth.

In summary, AAEA has no additional comments for the record and will await the June 21<sup>st</sup> public hearing on Docket 12-060-R.

Respectfully submitted,

/s/ Nate Coulter

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 28, 2013 I electronically filed the foregoing with the Clerk of the Commission using the ECF system and a copy was served on all parties via email or first class mail.

/s/ Nate Coulter

Nate Coulter