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To: Docket Control
Arizona Corporation Commission

From: Empire Power Systems

Date: August 4, 2005

Re: Distributed Generation Workshop: Interconnection Issues
Docket No. E-0000A-99-0431

Our company appreciates the opportunity to submit comments regarding the draft interconnection rule currently being studied by the Commission and recommended by the Distributed Energy Association of Arizona (DEAA).

As a supplier of electric power systems, we are very much in favor of a standard interconnect rule. It is our opinion that such a standard is necessary in order to provide reliable, safe, environmentally responsible and inexpensive electricity to a growing region.

Without a standard rule, the consumers in our state will be left without choices, thereby jeopardizing the region's growth potential. It is public knowledge that the current utility infrastructure is aged and borders on adequacy. Given the population growth and increased need for electricity that inherently comes with population, Arizona must put together a comprehensive energy strategy for serving the public interest.

Part of the overall strategy for meeting consumer demand for electricity will certainly involve distributed generation. With distributed generation, we can quickly add capacity to a burdened electrical grid and deliver clean, high quality electricity to consumers regardless of industry or geography. This source of energy does not require massive capital infrastructure that is often assumed by a handful of companies who then recover the capital costs by increasing rates to all consumers. The costs of distributed generation will be assumed by private companies who recognize the value in such systems. And the environmental impact that comes with overhead transmission lines can be alleviated by putting energy at the source of consumption.

The benefits of distributed generation are numerous and obvious. However, there needs to be a standard platform that will serve the needs of consumers as well as the utility companies. Our company endorses the Interconnection Rule as submitted by the DEAA Coalition in **Docket No. E-0000A-99-0431**.

If you have any questions or comments, please contact me at any time.

Brett Burns
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