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UNITED STATES
HEAT & POWER ASSOCIATION

August 17, 2005

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: Additional Comment on Docket No. E-0000A-99-0431

To Whom It May Concern:

The U.S. Combined Heat and Power Association (USCHPA) wishes to file these additional comments, as an addendum to the comments filed on August 11, 2005.

Since that filing, it has come to our attention that Cummins Power Generation has filed comments that have – among other things – requested that the size limit for standard interconnection be raised from 10 MW to 20 MW. The USCHPA supports this expansion, as it will facilitate broader national consistency on interconnection standards. Last year, FERC expended considerable effort on the size limits to their own standard, finally settling on a 0 – 2 MW standard and a 2 – 20 MW standard. This latter standard was briefly considered with a 10 MW limit, but was ultimately expanded for the reasons pointed out in Cummins' comments. Since other states are likely to follow FERC's leadership on this issue, we would expect 20 MW to become the de facto upper limit for interconnect standards in other states, and would encourage Arizona to adopt the same limit to ensure consistency therewith.

Sincerely,

Sean Casten
Chair, Energy Issues Committee

Arizona Corporation Commission
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