

ORIGINAL



0000024102

Cummins Rocky Mountain I

RECEIVED

47

390 Interlocken Crescent, Suite 200
Broomfield, CO 80021
Telephone: 303.927.2200
Fax: 303.227.0937

Bill Wolpert, President

2005 AUG 19 A 11:35

August 18, 2005 AZ CORP COMMISSION
DOCUMENT CONTROL

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

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

Dear ACC Commissioners:

Cummins Rocky Mountain (CRM), a Distributor of Cummins Inc., respectfully submits its comments to the Commission as it begins to deliberate on the Interconnection Requirements for Distributed Generation (DG). CRM is in full support of the comments filed by Cummins Power Generation (CPG).

CRM has a location in Phoenix at 2239 North Black Canyon Highway. We actively pursue power solutions and simplified interconnections procedures and uniform standards would greatly facilitate our business and lower costs to our Arizona customers.

We, in concert with CPG, applaud the Arizona Corporation Commission for undertaking this important rulemaking. We also urge the Commission to use the draft interconnection rule provided by the coalition of renewable and distributed energy groups as a basis for all further work on development of its interconnection policy. We echo the comments of CPG and highlight their comments as follows:

- The policy should cover DG power ratings up to 20 MW.
- All interconnection requirements should be per IEEE 1547.
- The ACC Rule should contain the requirements for closed transition transfer switches

Again, we commend you for beginning this proceeding and look forward to working with you and other stakeholders as the process continues.

Sincerely,

Bill Wolpert
President