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February 25, 2002

Nancy Cole, Supervisor
Document Control
Arizona Corporation Commission
1200 W. Washington
Division: Hearing
Phoenix, AZ 85007

Re: Request to Remain on Service List in Docket No. E-00000A-02-0051, Docket No. E-01345A-01-0822, and Docket No. E-01933A-02-0069

Dear Ms. Cole:

Pursuant to the February 8, 2002 Procedural Order in regard to the above consolidated dockets, the Arizona Cogeneration Association requests that it remain on the service list for purposes of the Generic Proceedings Concerning Electric Restructuring Issues, Arizona Public Service Company's Request for Variance of Certain Requirements of A.A.C. R14-2-1606 and Tucson Electric Power Company's Application for a Variance of Certain Electric Competition Rules Compliance Dates.

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Arizona Corporation Commission

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Sincerely,

Robert Baltes
President
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

IN THE MATTER OF THE GENERIC
DOCKET FOR ELECTRIC RESTRUCTURING

DOCKET NO. E-00000A-02-0051

IN THE MATTER OF ARIZONA
PUBLIC SERVICE COMPANY'S
REQUEST FOR A VARIANCE OF
CERTAIN REQUIREMENTS OF
A.A.C. R14-2-1606

DOCKET NO. E-01345A-01-0822

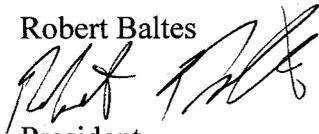
1. The Arizona Cogeneration Association (d.b.a. Distributed Energy Association of Arizona) provides the attached response to Chairman William A. Mundell's letters of January 14, 2002 and January 30, 2002 and Commissioner Marc Spitzer's letter of January 22, 2002 regarding electric restructuring.

2. The Arizona Cogeneration Association requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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Respectfully submitted this February 25, 2002.

Robert Baltes



President

Arizona Cogeneration Association

Response to Chairman Mundell's Letter of January 14 and January 30, 2002
Response to Commissioner Marc Spitzer's Letter's of January 22, 2002 Regarding
Electric Competition Rules

This paper is in response to Chairman Mundell and Commissioner Spitzer's requests for a list of specific answers and specific proposals on identified issues related to electric competition in Arizona.

In particular, in Section II.B.3.a of the enclosure to his January 14, 2002 letter, Chairman Mundell asks "Are there legal or technical barriers to the construction of the different types of generation plants by non-utilities?"

In particular, in question number 4 of his January 22, 2002 letter, Commissioner Marc Spitzer asked, "what disincentives (regulatory, financial and ratemaking) exist for the expanded use of renewable energies?"

First, the Arizona Cogeneration Association (d.b.a. Distributed Energy Association of Arizona), a non-profit organization, encourages the production of cogeneration (combined heat and power) and small power and renewable production in Arizona in an effort to conserve natural resources and to optimize the efficient use of facilities and resources. Our organization is concerned with electric generation in the 1 kW to 10 MW range. Our membership interest is in the areas of electricity generated by renewables, fuel cells, clean burning microturbines, reciprocating engines and small turbines.

We believe retail competition is possible with distributed generation (DG), renewables and cogeneration (combined heat and power). Also, we believe that DG is a customer choice issue. Deregulation was to provide customers with choices. DG is one of those choices.

According to Arthur D. Little consultants, in 1999 there were more than 60,000 MW of distributed power in North America in the form of reciprocating engines and gas turbines. That power was more than the total installed generation capacity in California.

Currently, several small power production and cogeneration plants exist in Arizona. See attachment A for a partial listing of plants. Most of these plants were constructed 5 to 15 years ago as "qualified cogeneration" facilities as provided for in the Public Utility Regulatory Policies Act of 1978.

Very few DG plants have been constructed in Arizona in the last five- (5) years because of well-established barriers to grid interconnection and the uncertainty regarding deregulation and electric rates.

The Arizona Corporation Commission (ACC) recognized the need for standardized interconnection rules and tariffs in 1999 when it opened ACC docket No. E-00000A-99-0431. However, standardized interconnection requirements were never established and this process was not completed. Without these rules and tariffs, DG in Arizona continues to be subjected to interconnection requirements, which add unnecessary cost and time delay to projects. Thus, DG is not competitive with traditional generation.

Arizona Public Service Company, Tucson Electric Power and Salt River Project have unilaterally issued interconnection rules and enforce tariffs, which discourage generation. For example, the requirements for liability and property damage insurance can effectively prohibit much small generation and power production. Also, net metering is not allowed for residential customers who may want to install new distributed generation equipment such as fuel cells.

The States of Texas, New York and California all have standardized Interconnection Requirements for Distributed Generation (DG). In April 2001, the California Energy Commission (CEC) expanded the range of photovoltaic and wind-driven generation eligible for net metering from 10 kW to 1000 kW through the end of 2002. On September 10, 2001, the three major investor-owned California utilities proposed the elimination of standby charges for DG and for 2002, the CEC established \$100 million in incentives administered through the utilities. This incentive pays up for up to 30% of the installed cost of a new DG project.

Arizona needs to adopt standard interconnection requirements, which provide both a safe interconnection and allow current state of the art technology. Interconnection standards that are currently being developed by national code groups should be considered.

DG tariffs, including partial requirements and standby rates, which represent the fair value of DG, need to be put in place.

An application process, which includes time frames for review and processing, pre-certification of distributed generation system packages, and standardized requirements for the need for interconnection studies are all required. Requirements and the costs for technical interconnection studies need to be clearly defined.

These items, long with many others, were identified in the ACC Distributed Generation and Interconnection Investigation. As an alternative rules and tariffs recently adopted by other States (e.g., New York or Texas) could be used as a basis by the ACC to implement DG. Completing these items are the required steps to establish an unencumbered and thriving decentralized marketplace, allowing customers to choose DG as a viable power supply option in Arizona.

DG has several economic benefits. An Arthur D. Little white paper, Distributed Generation; Understanding the Economics, 1999 lists several typical utility and customer DG benefits. These include:

- Avoided increases in system capacity - DG can provide an additional source of power that could preclude the need to expand generation, transmission and distribution (T & D) systems to meet increased electric demand in Arizona.
- Reduced T & D electric losses - DG avoids electric losses associated with transporting power over the T & D system
- T & D upgrade deferrals - Utilities can use DG to meet growing demands and defer investment in T & D capacity
- VAR support - Some DG technologies can provide reactive power (VARs) that can aid in maintaining system voltage
- Transmission congestion relief - By generating power at or near the point of consumption where there is congestion, DG can increase the effective T & D network capacity for other customers.
- Peak shaving - DG can reduce customer demands from the grid during high demand periods.
- Reduced reserve margin - By lowering overall demand levels for grid power and providing generation capacity, DG could reduce reserve margins.
- Improved power quality - DG can eliminate demand that negatively affects the power quality of the grid system.
- Increased power reliability - DG can reduce or avoid outages in certain parts of the distribution system.
- Avoided T & D siting concerns – By eliminating the need for new transmission and distribution lines, DG can avoid societal concerns over adding transmission lines.
- Reduced energy costs for thermal energy loads – DG, through combined heat and power (CHP), can produce steam or hot water that can be used in manufacturing processes or for space heating and cooling requirements.
- Decreased exposure to electricity price volatility – DG can allow customers to take more risks in energy markets or utility rates, since it acts as a hedge on volatile electricity prices.
- New Source of revenues – DG may allow customers to sell excess power or ancillary services to power markets.

An additional benefit of distributed generation includes the use of renewable energy. The increased use of renewables preserves our natural resources.

Since September 11, 2001, energy security has also become an issue. Dispersed generation capacity can provide power at several locations as opposed to one central location with a central transmission system, which may be able to be sabotaged, or otherwise disabled.

DG technologies are required to meet all environmental regulations and many DG technologies such as microturbines, fuel cells and renewables are non-polluting or exceed required environmental regulations.

Regarding competition, there are a number of companies in Arizona, which will provide Distributed Generation (DG) products and services. These companies include Empire Machinery, Stewart & Stevenson, Waukesha-Dresser, Williams Detroit Diesel, Cummins Southwest, Chevron Energy Solutions LP as well as companies involved in renewables and eventually fuel cell technologies.

The Arizona Cogeneration Association believes no significant risk exists for moving to a distributed generation market for small power production (less than 10 MW) and renewables. National standards, when available, for interconnection should be used to meet safety requirements. Cogeneration plants have been successfully installed throughout the State of Arizona in the past.

Based on supply and demand economics and the experience of other markets, the Arizona Cogeneration Association (d.b.a. Distributed Generation Association of Arizona (DEAA)) believes that competitive bidding will drive down electricity prices for standard offer customers in Arizona. Thus, a variance should not be given to electric competition rules that require competitive bidding for 50 % of the electric supply for standard offer customers.

DEAA anticipates that retaining this competitive supply requirement will have the effect of causing electricity prices in Arizona to more accurately reflect the true cost of power on an hourly, daily, monthly and seasonal basis. DG products and services become more valuable if real time pricing of electricity is considered and the true cost of electricity is used in billings.

ATTACHMENT A

Samples of Existing "Qualified" or Grid Separated Generation Facilities in Arizona

• Ina Road Waste Water Treatment Plant	4500 kW
• Biosphere 2	4000 kW
• Phoenician Resort	1650 kW
• Empire Machinery (Mesa)	1400 kW
• Luke Air Force Base	1200 kW
• Empire Machinery (Tucson)	1000 kW
• Gould Electronics	1000 kW
• Yuma Regional Medical Center	900 kW
• Tucson Medical Center	750 kW
• Phoenix Newspapers	750 kW
• Good Samaritan Hospital	700 kW
• Thunderbird Samaritan Hospital	600 kW
• North Phoenix Baptist Church	600 kW
• Del Webb Hospital	600 kW
• Cave Creek Unified School District	335 kW
• Estrella Mountain Community College	290 kW
• Paradise Valley Community College	230 kW

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the ARIZONA COGENERATION ASSOCIATION RESPONSE TO CHAIRMAN WILLIAM A. MUNDELL'S LETTERS OF JANUARY 14, 2002 AND JANUARY 30, 2002 AND COMMISSIONER MARC SPITZER'S LETTER OF JANUARY 22, 2002 REGARDING ELECTRIC RESTRUCTURING were filed with Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007, on the 25th day of February 2002, and a true and correct copy was sent by U.S. mail, first-class and postage prepaid, to each of the following.

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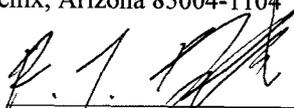
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