

ORIGINAL
ARIZONA MUNICIPAL POWER USERS' ASSOCIATION
POWER USERS'



47

501 EAST THOMAS ROAD ■ PHOENIX, ARIZONA 85012-3205

MICHAEL A. CURTIS
EXECUTIVE SECRETARY
Telephone: (602) 393-1700
Facsimile: (602) 393-1703
E-Mail: mcurtis401@aol.com

Arizona Corporation Commission
DOCKETED

FEB 21 2007

DOCKETED BY	nr
-------------	----

AZ CORP COMMISSION
DOCUMENT CONTROL

2007 FEB 21 P 2:47

RECEIVED

February 20, 2007

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

Re: AMPUA Comments on Distributed Generation Interconnection
Standard Staff Report Dated January 24, 2007 -
Docket No. E-00000A-99-0431

Dear Sir/Madam:

The following comments are being submitted by the Arizona Municipal Power Users' Association which is an association representing the electric entities of cities, towns, special districts and cooperatives serving over a million people in mostly rural Arizona, and hereinafter referred to as "AMPUA".

AMPUA members have much in common with the rural electric distribution Cooperatives and, at the same time, with other electric utilities in the State of Arizona. AMPUA is supportive of the collective utility comments, but in particular those of the Cooperatives.

The following are AMPUA's comments regarding the application of the standard to all electric distribution companies, the termination of the interconnection agreement and Section 4.4, Level 2 that have not been addressed by the Joint Utilities' Position Papers. These comments address the circumstances that are unique to non-jurisdictional small utilities and Cooperatives.

Consideration of the PURPA Standard on Interconnection

Staff's proposed standard would apply to all electric distribution companies in Arizona that are regulated by the Commission. While most AMPUA members are non-jurisdictional, the actions of the Commission do set precedent and act as a public guide which influences the members of AMPUA which are non-jurisdictional. This is in contrast to the PURPA standard that applies only to electric distribution companies with retail sales of more than 500,000 MWh.

AMPUA Comments

Congress in enacting the PURPA standard recognized the need to exempt very small electric distribution companies with retail sales of less than 500,000 MWh due to the operational and financial impacts to these small electric distribution companies. The Cooperatives would request that Commission grant an exemption to electric distribution companies with retail sales of less than 500,000 MWh because these systems are not equipped with the manpower or financial resources to meet the requirements in proposed Arizona standard.

Additional Comments on Level 2, Section 4.4

4.4 Level 2 Fast Track Process

AMPUA concurs with Staff and with the DG Advocates that the Cooperatives' proposal to add the language "normally not more than" before the number of business days in these sections should not be necessary because if the Level 2 time frames are set at reasonable levels, they should be firm.

AMPUA Comments

AMPUA supports the position of the Cooperatives proposing to add the following language, "normally not more than" before the number of business days in these sections listed below for the reasons outlined below.

1. The time frames in Level 2 may be set at reasonable levels for large utilities with the staff and expertise to process these applications. However, small municipal and other non-jurisdictional as well as cooperatives may not have the level of staff or expertise to process these applications in the time frames listed.
2. There is the potential of having to process a very complicated system under level 2. On larger more complex applications, a small municipal will need to consult an expert in generators and/or protection equipment to determine if an application

is complete or not. In addition, if more than one person needs to review an application, then the time needed to do so increases. In this case, the municipal would no longer have full control of the time taken to review an application and would be subject to the timetable of a consultant.

3. Non-jurisdictional AMPUA members often try to adopt policies established by the Commission and certainly in this regard AMPUA supports the concept that while members may attempt to process each of these applications within the 15 days. However, there may arise a time when several applications are filed within a short amount of time, or an employee or consultant with a specific area of expertise is needed to review the application, and that person is either not available or is otherwise occupied.
4. An application may meet all of the screens for level 2, but the utility will need to look at its own system to see if any changes need to be made to accommodate the generator. For example breaker settings may need to be modified, or a capacitor might need to be installed to correct power factor problems. The utility will want to know exactly what changes will be necessary before giving a generator permission to connect to their system. This is especially important with larger generators.

4.4 Level 2 Fast Track Process

(c) **Application is Received and is Complete or Incomplete.**
The Utility notifies the Customer within normally not more than five (5) business days of receipt of the Application as to whether it is complete or incomplete.

(d) **Utility Review Application.** Normally not more than within fifteen (15) business days following the receipt of a complete Interconnection Application, the Utility reviews the proposed interconnection and notifies the Customer of one of the following determinations:

AMPUA appreciates the opportunity to submit these comments.

Very truly yours,

ARIZONA MUNICIPAL POWER USERS'
ASSOCIATION

By 
Its Executive Secretary

AMPUA Comments on Distributed Generation Interconnection
Standard Staff Report Dated January 24, 2007
Docket No. E-00000A-99-0431
2/20/07
Page 4

Original and 13 copies filed with Docket
Control this 20th day of February, 2007, with:

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

Copies of the foregoing delivered
This 20th day of February, 2007, to:

Barbara Keene, Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

CGSUS HD: CGSUS AFS:COOPERATIVES:ACC Distributed Generation:021607 AMPUA Comments on Staff Report on DG
Interconnection Standards.doc