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RECEIVED FENNEMORE CRAIG, P.C.

3003 North Central Avenue, Suite 2600  
Phoenix, Arizona 85012-2913  
(602) 916-5000

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Patrick J. Black

Direct Phone: (602) 916-5400

Direct Fax: (602) 916-5600

pblack@fclaw.com

ARIZONA CORPORATION COMMISSION  
DOCUMENT CONTROL

Law Offices

Phoenix (602) 916-5000

Tucson (520) 879-6800

Nogales (520) 281-3480

Las Vegas (702) 692-8000

Denver (303) 291-3200

February 21, 2007

Arizona Corporation Commission  
DOCKETED

FEB 21 2007

**BY HAND DELIVERY**

Arizona Corporation Commission  
Docket Control  
1200 W. Washington Street  
Phoenix, Arizona 85007

DOCKETED BY  
NR

Re: **GENERIC INVESTIGATION ON  
DISTRIBUTED GENERATION  
Docket No. E-00000A-99-0431**

Dear Sir/Madame:

Please accept for filing in the above captioned matter the original and 13 copies of Arizonans for Electric Choice and Competition's Comments on the Staff Report on Interconnection enclosed herewith.

Should you have any questions, please do not hesitate to call.

Thank you.

Sincerely,

Patrick J. Black

PJB:mb

Enclosures

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

**COMMISSIONERS**

**JEFF HATCH-MILLER, Chairman**  
**WILLIAM A. MUNDELL**  
**MIKE GLEASON**  
**KRISTIN K. MAYES**  
**GARY PIERCE**

**IN THE MATTER OF THE ARIZONA  
CORPORATION COMMISSION'S  
GENERIC INVESTIGATION OF  
DISTRIBUTED GENERATION**

**DOCKET NO. E-00000A-99-0431**

**ARIZONANS FOR ELECTRIC  
CHOICE AND COMPETITION'S  
COMMENTS ON STAFF'S REPORT  
ON INTERCONNECTION**

Arizonans for Electric Choice and Competition ("AECC"), through undersigned counsel, hereby provide these Comments to Staff's Report on Interconnection. On January 30, 2007, Arizona Corporation Commission Staff ("Staff") filed its "Staff Report on Interconnection" ("Report") in the above captioned docket and invited comment from interested parties. AECC hereby sets forth its Comments on Staff's Report and the associated appendices, including Appendix 3 of the Report entitled "Interconnection Document."

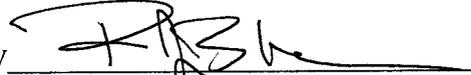
As indicated in Appendix 1 of Staff's Report, AECC participated in the 2005 and 2006 Workshops conducted by Staff as directed by Commission Decision No. 67744. In general, AECC does not oppose Staff's Report Conclusions and the resulting Interconnection Document. AECC believes that the development and implementation of viable distributed generation projects requires the application of fair and reasonable interconnection standards. AECC contends that the same fair and reasonable interconnection standards should apply to all electric utilities regulated by the Commission and, as such, supports Staff's recommendation to adopt and apply a modified version of the PURPA standard to all ACC-jurisdictional utilities irrespective of size.

1 AECC specifically supports Staff's Findings and Recommendations regarding  
2 Section 2.5 ("Non-Circumvention") of the Interconnection Document. During the  
3 Workshop process, AECC supplied and advocated for the specific language now  
4 recommended by Staff in Section 2.5 of the Interconnection Document. AECC reaffirms  
5 its belief that this language represents the appropriate standard for protection of customer  
6 rights with respect to their information regarding distributed generation projects.

7 AECC urges the Commission to adopt Staff's Recommendation to initiate a  
8 Rulemaking Process to convert the Interconnection Document into Interconnection Rules.

9 RESPECTFULLY SUBMITTED this 21<sup>st</sup> day of February, 2007.

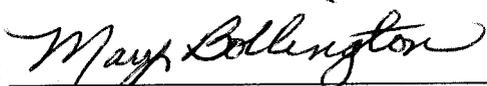
10 FENNEMORE CRAIG, P.C.

11  
12 By:   
13 C. Webb Crockett  
14 Patrick J. Black  
15 3003 N. Central Avenue, Ste. 2600  
16 Phoenix, AZ 85012-2913

17 Attorneys for Arizonans for Electric Choice and  
18 Competition

19 ORIGINAL and 13 COPIES of the foregoing  
20 FILED this 21<sup>st</sup> day of February 2007 with:

21 Docket Control  
22 ARIZONA CORPORATION COMMISSION  
23 1200 West Washington  
24 Phoenix, Arizona 85007

25 By:   
26 1886886.1/23640.041