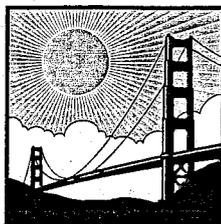


ORIGINAL



0000070011

RECEIVED

2007 APR -3 P 4: 52

Vote Solar

APR 11 2007	06
By _____	

AZ CORP COMMISSION
DOCUMENT CONTROL
March 29, 2007

Chairman Mike Gleason
Commissioner Jeff Hatch-Miller
Commissioner Kristin K. Mayes
Commissioner William Mundell
Commissioner Gary Pierce

Arizona Corporation Commission

DOCKETED

APR -3 2007

Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

DOCKETED BY	ne
-------------	----

RE: Implementation of ACC Rules: Tucson Electric Power Company Sunshare Program
~~Docket No. E-01033A-06-0473~~
Docket No. E-00000A-99-0431
~~Docket No. RE-00000C-05-0070~~

Dear Commissioners:

As the solar community prepares to assist in the implementation of the Renewable Energy Standard and Tariff ("REST"), we have some concerns about some unilateral decisions taken by the Tucson Electric Power Company ("TEP") regarding the establishment of a nonresidential component to its Sunshare program. TEP proposes some novel requirements that will increase costs dramatically, have no precedent in similar programs in other jurisdictions, and are unsupported by the REST rulemaking or other proceedings before the Commission. Specifically, TEP seeks to require:

- Data monitoring requirements that require customers to purchase, install, monitor, and update a system capable of collecting "plane of array solar insolation in watts/M², ambient temperature in degrees F., wind speed in miles/hour and actual AC power output in watts...on an average time interval not to exceed five (5) minutes for each data point throughout the day." Purchasing and installing this system will increase costs by up to \$8,000 per system. There has been no demonstration of why collecting wind speed information is necessary, what will be done with the data, how the collection of the data benefits ratepayers, why the costs are justified, and why the costs should be born by the customer. These requirements are dramatically different from industry practice.
- An isolation transformer. This requirement is not justified by safety concerns and has no precedent in other states.