

# ElectriSol Ltd.

ORIGINAL



Solar Energy Consulting and Representation

RECEIVED  
AZ CORP COMMISSION



MAY 21 10 14 AM '99

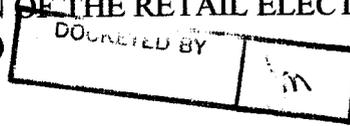
19 May 1999

DOCUMENT CONTROL

Docket Control  
Arizona Corporation Commission  
1200 West Washing  
Phoenix, AZ 85007

Arizona Corporation Commission  
DOCKETED

RE: THE GENERIC INVESTIGATION OF THE DEVELOPMENT OF A RENEWABLE  
PORTFOLIO STANDARD AS A PORTION OF THE RETAIL ELECTRIC COMPETITION  
RULES (DOCKET NO. E-00000A-99-0205)



COMMENTS on DOCKET NO. E-00000A-99-0205:

In brief, it is our opinion that the eight (8) 'proposed questions' outlined in the ACC Staff's 'Portfolio Standard Letter', 7 May 99, are adequate and appropriate for the purpose of discussion of a Portfolio Standard within the procedures of the above referenced Docket No. E-00000A-99-0205. Further we believe that the proposed Schedule is sufficient for the purpose of that discussion, Hearing, and possible decision. If anything, we would contend that the questions are redundantly broad and that the schedule could be shortened considerably.

In light of the proposed 'APS Settlement' relating to a major portion of the Retail Electric Competition Rules, which could speed implementation of those Rules substantially, we would suggest that the Commission, Staff, and Hearing Division should have considerably more time to clean up the details of the minor points of the Rules, such as the Portfolio Standard, and include them in the Rules when Competition officially begins. (As a small aside, I would point out that although there appear to be several major 'interested' parties signed on to the APS Settlement, I did not see any mention of the Attorney General's office which as I recall had a major objection to the speed with which the original Rules were adopted on 11 December, 98.)

Lastly, we would point out that, as stated in the Portfolio Standard Letter, 7 May, 99, there was a great deal of input gathered and discussions argued starting in December 96 and leading up to approval of the previous Rules in December 98. Most, if not all, of the above referenced 'Suggested Questions' have been discussed and considered at length over the past 2-3 years. There are a few modifications to the 'old' Portfolio Standard which should, of course, be reviewed and discussed but in general we believe the questions should be as few and the discussion should be as focused, and as brief and timely, as is legally possible.

  
Lee W. Tanner  
President

1215 East Harmont  
Phoenix, Arizona 85020 USA  
(602) 997-6855 • Fax: (602) 943-5842