

AZ-ICE



0000085193

EXCEPTION
THE COALITION ON ENERGY

Phoenix AZ 85011-0051

BOARD OF DIRECTORS:

- John W. Acer
Presbytery of Grand Canyon
- Richard Avner
Heritage Presbyterian Church
- Roy Baumann
Roman Catholic Diocese of Phoenix
- Jacob Berger
Beth El Congregation
- Marjorie D. Clamons
United Methodist Church,
Desert Southwest Conference
- Daniel Moore
Episcopal Diocese of Arizona
AZ-ICE Audit Project Coordinator
- Dr. Arlo Nau
Arizona Ecumenical Council
- Jack Schuler
Presbyterian Synod of the Southwest
- Darshan Singh Tejl
Energy Conservation Administrator,
City of Phoenix (Retired)
- John R. Wilson, C.P.A.
Community Presbyterian Church,
Payson

RECEIVED

(602)944-0640

March 27, 2000

2000 MAR 27 P 3:47

BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION
 Carl J. Kunasek, Chairman
 Jim Irvin, Commissioner
 William A. Mundell, Commissioner

IN THE MATTER OF THE GENERIC
 INVESTIGATION OF THE DEVELOPMENT)
 OF A RENEWABLE PORTFOLIO)
 STANDARD AS A POTENTIAL PART OF)
 THE OF THE RETAIL ELECTRIC)
 COMPETITION RULES)

RECORDED BY
) DOCKET NO. *[Signature]*

E-00000A-99-0205

MAR 27 2000

AFFILIATES:

- Arizona Ecumenical Council
- Central Phoenix Corporate Ministry

RE: New Proposed Rule of April 8, 1999, entitled Solar and Environmentally - Friendly Portfolio Standard (New Rule 1609).

Dear Sirs:

The Arizona Interfaith Coalition On Energy (AZ-ICE) has studied a copy of the recommendation of Hearing Officer Jerry Rudibaugh, consisting of a 23 page Opinion and attached recommended Decision of 6 pages, and respectfully requests that its objections thereto, set forth below, be made a formal part of the public record in said proceedings at the Commission's Working Session and Open meeting to be held on March 28, 2000 and March 29, 2000.

AZ-ICE objects to adoption of the Proposed Decision for the following reasons:

1 The Commission needs do no more than take Judicial Notice, which is hereby and herewith invoked by AZ-ICE, of long established climatological and geographical facts, which demolish the central issue proffered by APS that because the intense heat of Phoenix impairs the efficiency of solar photovoltaic generation (Flagstaff being a comparatively better solar electric site- p. 5, line 9 ff, issue 1), Arizona is less than an optimal solar resource for efficient solar photovoltaic generation (p.19, line 3 ff, Finding 11). Further, the three electric utilities, APS, TEP, and Citizens, are all certificated in the areas where these contentions can be disproven, and are all subject to Commission jurisdiction.

A. Climatologically, it has been long established that the area of the entire United States which each year receives the most sunshine per annum is an area which begins on the Mexican border roughly halfway between Yuma and Nogales, and is thereafter bounded on the north by a line running easterly from the point of beginning, north of Nogales, Sonoita, and Bisbee, and thence a few degrees southerly on a line north of Douglas to the southeast corner of the State of Arizona, where it the passes into the State of Chihuahua, Mexico.

- B Geographically, the average altitude of this area is 4,000 feet, according to the evidence offered by APS an ideal altitude for efficient photovoltaic generation. Further, the snow cover in the entire area is light and never long lasting, and the population does not offer any serious impediment to the installation and operation of massive solar photovoltaic generators of all types.
- C. The western and some of the central portions of this large area are within the certificated area of TEP, Santa Cruz County in Citizen's certificated area, and the remainder to the east in the certificated area of APS.
- D Salt River Project (SRP), while not subject to Commission jurisdiction, has an operating territory which includes many areas suitable for similar suitable experimentation with only slightly less sunshine per annum, and which could provide significant information in cooperation with any Commission order.

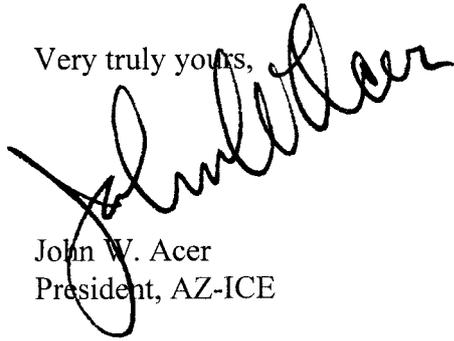
2 The original proposed Rule 1609 contemplated the adoption of a rule requiring a mandated environmental standard of 1% (EFPS Standard No.1), which is necessary for any realistic, as opposed to specious, development of a significant solar energy capacity in Arizona, as is being done in the other States to the full extent of their various potentials.

3. The Commission's Staff recommended the institution of a Solar Portfolio Standard of 1 per annum, kWh-based, indicating clearly the Commission's original intent in its April 8 1999, filing of proposed New Rule 1609.

4. The Hearing Officer has recommended a dollar based solar standard which does nothing for Solar development in the State of Arizona and United States, but protects to the maximum possible extent the existing investment of the utilities within the jurisdiction of the Commission.

5. The massive support of companies consuming electricity to the contentions of APS et al are not productive of preserving and promoting competition, but rather the opposite, and they can all without exception be counted upon to be the first to demand service from Solar generated electricity the minute it becomes cost competitive. Of course this will never happen, in Arizona at least, if no experimentation and implementation is done, but under competition this will not prevent them from going elsewhere to obtain Solar generated, low cost, electricity, as many of them are now doing under existing conditions by buying hydro generated electricity in Montana for wheeling to Arizona.

Very truly yours,



John W. Acer
President, AZ-ICE

cc: David C. Kennedy, Esquire
Daniel E. Moore, Project Co-ordinator