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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

C.H. HUCKELBERRY
County Administrator

Arizona Corporation Commission
DOCKETED

NOV 24 2010

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November 22, 2010

The Honorable Commission Chair Kristin Mayes and
The Honorable Commissioners Sandra Kennedy, Paul Newman, Gary Pierce and Bob Stump
Arizona Corporation Commission
Commissioners Wing
1200 W. Washington, Second Floor
Phoenix, Arizona 85007

Re: Editorial Regarding Aggregate Net Metering for Docket No. E-00000J-10-0202

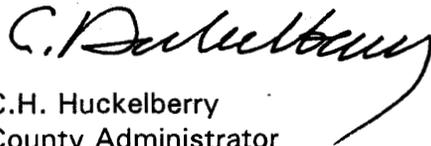
Dear Chair Mayes and Commission Members:

Please find enclosed my guest editorial regarding Aggregate Net Metering that appeared in the November 21, 2010 edition of the *Arizona Daily Star*.

As I state in the editorial, I am confident the Commission and your staff can structure an Aggregate Net Metering rule that is reasonable and equitable to all parties and that will result in a win-win for ratepayers, utilities and the State of Arizona as a whole.

I understand you will be discussing this issue at your public meeting on Tuesday, November 23, 2010. If I can assist you with any information prior to your discussion, please contact me directly or our Sustainability Manager, Tedra Fox, at 520.740.8766.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/mjk

Enclosure

c: Ernest Johnson, Executive Director, Arizona Corporation Commission
Tedra Fox, Pima County Sustainability Manager

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BY

 Arizona Daily Star

Net-metering utility plan would boost alternative energy in county

Chuck Huckelberry Special To The Arizona Daily Star | Posted: Sunday, November 21, 2010 12:00 am

When the Arizona Corporation Commission (ACC) meets on Tuesday, it should endorse a new regulation that will allow Pima County and other large organizations to build solar-energy plants that would, in effect, supply much of their own electricity.

The technology to make this possible is clean, safe and economical, and it benefits taxpayers by reducing government expenses. It would potentially help county government lower its electric bill by approximately \$60 million over a 20-year period. These savings would be passed on to local taxpayers by alleviating the need for increased taxes that would likely accompany the rising cost of conventional energy.

The regulatory change would also reduce our dependence on energy created with natural gas and coal, whose prices increase every year, and increase our use of energy from the sun, which costs us nothing. And while the costs of coal and natural gas and construction of conventional power plants are continuously increasing, the cost of solar-generated electricity is getting cheaper each year.

Replacing our dependence on nonrenewable resources with a system that relies on a dependable, renewable resource makes perfect sense economically and environmentally.

In 2004, Pima County voters approved \$10 million in bonds to enable the county to purchase vacant land in Davis-Monthan Air Force Base's departure corridor. This provided some assurance that the base, a major factor in our area's economy, would remain in Pima County. This vacant land can become the home of a large array of solar panels that would generate much of the electricity the county now must purchase from Tucson Electric Power (TEP). The county has other lands purchased for landfills and flood protection that can also be used for solar panels - in effect, turning them into income-producing properties that benefit local taxpayers and reduce consumption of carbon-based fuels.

If the ACC adopts the new regulation, formally called Aggregate Net Metering (ANM), it could benefit every city and county government, as well as other large electricity users, not just in Pima County but throughout the state. This will also greatly reduce water consumption and the need for expensive transmission lines.

The ANM concept is simple: Large power users who support clean, renewable energy and are willing to install solar facilities on land that is not directly adjacent to the buildings where the power will be used should be allowed to do so. At present, this is not allowed. Many potential users are located in congested areas (such as downtown Tucson) where land is extremely limited or not available for a solar installation.

If the ACC adopts the ANM policy, we could create a solar installation on county land remote from downtown, feed the electricity into TEP's grid and then be credited for the amount we have contributed.

This would reduce county and ratepayer expenses for electricity and potentially reduce the amount of coal, natural gas and water consumed by utility companies for electricity generation. We are confident the ACC could structure the program in a way that makes it a win-win for taxpayers and utility companies. ANM would be a positive step for taxpayers, the state's economy as a whole and the health of our air and water supplies.

Arizona should join the seven other states - California, Connecticut, Delaware, Oregon, Pennsylvania, Rhode Island and West Virginia - that have already adopted some version of ANM.

Chuck Huckelberry is Pima County administrator. Email him at chh@pima.gov