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RE-00000C-94-0165

Mr. Ray Williamson  
Acting Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington, Room 206  
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Arizona Corporation Commission

DOCKETED

JUL 27 1998

July 23, 1998

DOCKETED BY *[Signature]*

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AZ CORP COMMISSION

Dear Mr. Williamson,

I would like to address several issues regarding Docket # R E 00000 C-94-0165 re: proposed revisions of the Retail Electric Competition Rules (R14-2-1601 et al). I commend the Commission for convening the public hearing on July 16, 1998 in Tucson. I learned a great deal and was impressed particularly with the thought and preparation which went into Commissioner Jennings' responses and statements.

As a citizen who has successfully lived off-the-grid for the past 18 months, I can attest that solar works. In Arizona, there is no reason NOT to be using it. In the long term, it pays for itself. And the long term is what is at issue here. I support a strong solar portfolio in the revision of the Retail Electric Competition Rules. While the 1% target inclusion of solar for year 2002 is a commendable starting point, I would like to see a much stronger solar portfolio in following years. I believe that as fossil fuels become depleted and more expensive to use, and as we document increasingly the hidden costs of using fossil fuels (in terms of health and environmental pollution), and as technology advances, the economic payoff will independently support this move. Let us be proactive, a leader in this country, toward economically viable, environmentally sound energy practices. Such proactive movement will itself breed economic payoff.

I strongly support opening up the penalty fund to everyone—in particular, individual rate payers. Moreover, I support the outline submitted by the Solar Alliance regarding the “ramp-up” penalty system, in which repeat offenders who fail to include the solar portfolio must pay increasingly higher fines. Such direction must be taken if the solar portfolio is to be included as part of all competitors' fuel sources.

While the Solar Portfolio has focused on PV systems, there should be inclusion of hot water systems in the solar portfolio. This is because, as you know, electric hot water systems are among the most inefficient appliances on the market, using large amounts of electrons. In the "big picture" inclusion of hot water systems—which reduces dependence on fossil fuels—makes sense as part of a solar portfolio.

In support of another speaker's suggestions at the public hearing on July 16, 1998, I would urge benefits be directed toward companies which demonstrate investment in the community. It is time that the power companies service the People's needs, rather than creating commerce systems in which dollars and cents are framed independently of quality of life and community. The large majority of speakers on July 16, 1998, spoke to creating this community and responsibility to quality of life as the major framework within which competition is framed.

I strongly support deregulation of retail electric competition.

I strongly support economic support and education for economically disadvantaged people.

Besides these suggestions, raised by others, I have two concrete suggestions which perhaps you have not heard. I believe that these suggestions ought to be implemented.

First, the implementation phase of the new rules and methodologies really must include a *useful* educational component, so that it can be effective. Commissioner Jennings suggested that written comparisons (of energy source, price) would be supplied to the public as they shop for sources. While this is fine, as an educator of diverse learning populations, I can easily anticipate that some  $\frac{1}{2}$  -  $\frac{3}{4}$  of the population will be immediately excluded from learning by this means alone. This is because many or most people, upon reading "amps", "volts" "watts" in absence of any real experience in the world which allows them to cognate what these measures and terms mean, will simply *fail to read* (either in terms of actual reading or in terms of understanding what they have read). Rather, I know from experience that the only way to truly educate such people is with "hands on" experience in the form of workshops.

Perhaps credits could be offered to the public who participates. The method and content of such workshops would be short and simple. The goal would be to have participants actively experience the energy consumption by various appliances through viewing such consumption by a meter, such as a trimetric monitor, as the appliances are used. As part of my move to off-the-grid power, I had a trimetric monitor installed in my house (this monitor shows amps-consumption in real time). With the push of a button I can see immediately what is the impact of leaving an iron on for 5 extra minutes while I talk on the phone. Within such an educational framework, which again may be high priced initially, but low cost in the long run—as people act on their education—the notion of "amps"-consumption makes sense. Moreover, conservation efforts, such as realizing how detrimental it is to leave high-consumption appliances on for even a few extra

minutes is a key to *painless* conservation. It is key to the concept behind inclusion of a solar portfolio in retail electric—which is the big picture of creating sustainable energy sources and practices. I reiterate: abstract numbers, foreign terms set on paper and independent of real experience will immediately rule out some 50-90% of the population (more or less) from the information dissemination process. Such people will not become informed consumers—due to the poor quality of the educational method itself. Please give this suggestion I offer a chance. And call upon me if I can be of service to help implement such education (I am a specialist in learning and in workshop organization, and am experienced in alternative/sustainable energy systems and practices).

Second, it is clear to me that responsibility is bread by “ownership”. By “ownership” I mean personal investment, of which economic investment is one type. It is clear from the concerns raised by the many citizens at the public meeting that public support is growing for framing *dollars and cents, consumers and competitors*, within a context which foremost considers quality of life and community. At the same time, I believe that if everyone is taxed to pay the price to incorporate solar and other alternative/sustainable technologies as source points for our energy needs, the result easily becomes an anti-sustainable-energy attitude. Rather the hearts and minds of people are won by education and willing participation, that is freedom to choose and appropriate rewards to go with those choices.

Commissioners at the public meeting of July 16, 1998, spoke to the initial high cost of incorporating solar as a source of competitive retail electric.<sup>1</sup> Let those people who choose to pay premium prices in order to elect to use solar/alternative power choices reap the benefits when such alternative power sources become cheaper than fossil fuels—i.e. in the not-too-distant future. While focus at the meeting was on the initial short-term cost of such fuel sources, in this short-term view, nothing at all was mentioned about the coming time when alternative fuel sources become demonstrably cheaper than fossil fuels. We know that this is the not-too-distant-future: just look at the relative cost of using alternative fuel sources 10 years ago as compared to today. If this trend continues—as it will, especially as solar power sources become mandated—alternative power sources will eventually become much cheaper—by every measure, including health and pollution measures--than fossil fuels.

Please incorporate into the new structures a way for people who --willingly-- pay the greater price for alternative energy sources to have ownership in the end. Let the vision and risk of the early risk-takers pay off in terms of ownership. I suggest that while such people commit to paying higher prices, a very concrete arrangement be reached about what economic benefits they will reap as alternative energy prices drop. Such an arrangement would presumably be based on ratio: while higher priced, solar power

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<sup>1</sup> In do not agree that the cost is, in the short term, high, relative to fossil fuels. The health and pollution effects of fossil fuels are not measurable. Hence, any discussion of relative price is not factual, rather can only be based on belief systems.

sources are higher priced to consumers. When lower priced than fossil fuels, such sources should be lower to all people—but especially to consumers who carried the initial vision.

As an entirely off-the-grid home owner (for two years now), I am entitled to attest: Solar works and there is every reason to use it in our state. I built my system with my own money--not that of the bank. I have put my money where my mouth is. At present I have no interest in nor intent to tie into the grid. I write this letter, therefore, with no direct benefits to myself as a future power consumer. I'm off the grid to stay, with the grace of god. I tell you this so that you understand that I have no personal gain in mind by taking this afternoon to write this letter. Rather, I do so as a matter of personal responsibility for the privilege of living on this planet in these complex times. My commitment is to the planet and all of us who are lucky enough to share it. I speak as a voice for these denizens of planet earth. And, regarding the educational component, I speak as a professional educator.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cari Spring".

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Cc: Commissioner Jennings, Commissioner Irvin, Commissioner Kunasek