



GOLDEN GENES
Sunlight to Service



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May 13, 1999

Arizona Corporation Commission
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Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

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Re: Comments on Proposed Rules on Electric Competition,
Docket No. RE-00000C-94-0165

Corporation Commission,

Pursuant to the Commission's Procedural Order dated April 21, 1999, Golden Genesis Company hereby submits its comments regarding the Proposed Rules.

Golden Genesis Company, (NASDAQ: GGGO) is the largest publicly owned distributor and integrator of solar electric components and systems in the United States. We are currently headquartered in Golden, Colorado. However, our main operations, our Global Distribution Business and our solar electric systems integration units are located in Scottsdale, Arizona. We employ 80 people in our Scottsdale facility and 165 people in total. Within North America, we have additional operating locations in California, Florida, Montana, Vermont and Canada. We also own and operate solar electric businesses in Australia, Brazil, and Argentina. In 1998 Golden Genesis purchased and resold, in the form of components or systems, approximately 4.5 Million Watts of solar electric modules. We are currently the largest commercial buyer and reseller of solar electric modules in the world. Our 1998 sales revenues were approximately \$48 Million, company wide.

We at Golden Genesis Company urge the Commission to retain the Solar Portfolio Standard (14-2-1609). We are keenly aware that much testimony and opinion has been offered both for and against the standard. We support a "cost effective standard" and we believe this standard can be shown to be cost effective, depending on how the analysis is framed. In other words, the determination of cost effectiveness almost always depends on how the analysis is framed. As a commercial business, we use a time frame in our analysis that includes the lives of our children. We think the motto for Earth Day 1990 makes clear the need to consider this time frame: "We do not inherit the earth from our parents, we borrow it from our children."

In our view, the Commission must protect today's commercial market and at the same time, consider a time frame that is sufficient to serve our children's future. The Commission is in an ideal position to demonstrate leadership on this important issue. Golden Genesis Company has a long-term commitment to the commercial use of renewable energy and we look forward to participating in a process that leads to the successful adoption of a Portfolio Standard in Arizona.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Michael Davis". The signature is fluid and cursive, with the first name "J. Michael" and the last name "Davis" clearly distinguishable.

J. Michael Davis, P.E.
President & CEO

President,
Solar Energy Industry Association