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AZ CORP COMMISSION

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May 18, 1999

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

Arizona Corporation Commission

DOCKETED

MAY 20 1999

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

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Dear Sir,

Pursuant to the Commission's Procedural Order dated April 21, 1999, PVI Photovoltaics International hereby submits its comments in the above captioned matter.

PVI is one of the major US solar photovoltaic concentrator manufacturers with a technology particularly suited to locations with high levels of clear direct solar insolation such as Arizona.

Below are comments and suggestions regarding the 8 questions prepared to outline the issues to be discussed in this docket:-

Questions 1&2 seem most appropriate. Question 3 regarding the in-state incentives might usefully include some mention of the competing production incentives being offered by other states such as Virginia. Question 4 regarding the calculated impact on an average residential monthly bill while appropriate will probably lead to difficulties in defining relevant, current technology costs. Developing a consistent basis for complete system cost comparison across technologies will be a significant challenge.

Questions 5 & 6 are relevant questions that speak to the practical challenges associated with establishing this Portfolio standard.

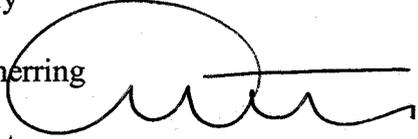
As to question 7 one might assume that the overall objective of the Portfolio was established prior to starting the process rather than asking such a fundamental question at this point. The inclusion of question 8 could well lead to considerable additional delays in establishing any such mechanism given the possibility of receiving suggestions on novel approaches without well established foundations.

I strongly urge that the Commission retain the Portfolio Standard with all of its provisions as part of the competition rules. Given the excellent solar resources in Arizona and the evident environmental benefits associated with adopting clean solar based electricity one looks to the Commission to establish at least this Portfolio Standard

Sincerely

Chris Sherring

President

A handwritten signature in black ink, consisting of a large, rounded initial 'C' followed by several wavy, connected strokes representing the rest of the name.

Enclosed: 10 copies of original letter.