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May 13, 2011

Chairman Gary Pierce  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

Arizona Corporation Commission  
**DOCKETED**  
MAY 16 2011

Docket No. E-01575A-10-0308

DOCKETED BY 

Dear Chairman Gary Pierce and Commissioners:

I would like to request the following change to the SSVEC REST Plan for 2011.

Raising the Cap appears to be one of the major issues of contention in this REST Case. I agree the high cap rate is a hardship on the SSVEC customers. The backlogged Sunwatts funds for Renewable Systems installed can be addressed without raising the CAP in the 2011 REST Budget.

Recommend the following changes:

- 1) **The Clean Renewable Energy Bonds ("CREB") for Schools Program (Page 5 line 20 Staff ROO)**

SSVEC change this program repayment to be at a rate of \$4.00 per watt maximum, which would not exceed \$348,333 from the REST budget per year.

Additional comments are included below.

- 2) **The Sun Watts Large-Scale Generating Program (Page 5 line 24 Staff ROO)**

SSVEC should not be allowed to pay 100% of the Creb Bond for Utility scale projects from REST Funds. Other utilities are not allowed to do this and SSVEC should adhere to the same rules. Only the portion that exceeds the cost of a conventional installation should be paid from the REST Funds.

- 3) **SSVEC has requested the 2011 REST Budget also be approved for 2012. I must object to this request, as SSVEC should file a budget for each year.**

**1.a) The SSVEC "The Public Schools Clean Renewable Energy Bond Program" (Dec. 2007) - addressing #1 above.**

Reducing the SSVEC CREB repayment formula would effectively reduce the back log without raising the cap, which has so vociferously been opposed by the SSVEC company and many customers in the Docket.

Residential consumers do appear to be leading the charge in the SSVEC area for solar installations. When the consumer is willing to invest their time and money to install windmills, solar panels and heaters at a discounted rate for the utility, this is an invaluable resource for Utility Companies to utilize "Other Peoples Money" OPM (customers) as investment capital to attain their Renewable Energy Compliance Requirements.

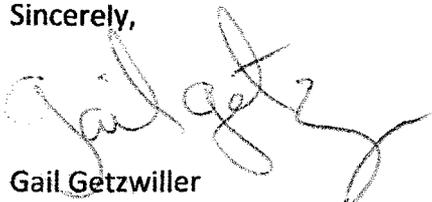
SSVEC paid \$12 per installed watt for "The Public Schools Clean Renewable Energy Bond Program" (Dec. 2007), more than 2 times the going rate for installed PV. It would seem prudent to stretch the REST Funds by using OPM to subsidize the installation of Solar Energy on customer sites through the REST fund. The same number of Renewable Energy watts can be achieved for less overhead as well as dollars spent per watt by the Utility, through the Net Metering Program.

SSVEC is using 100% of REST funds to pay back the School CREB Bond, as this is more than any other customer would receive for a rebate. At the time of this installation customers only received \$4 per installed watt and now they want to lower the rebate to \$2 per watt.

SSVEC is asking for \$1,045,000 per year to pay back this debt. This single expense has depleted SSVEC's REST budget needlessly and caused serious loss of credibility in the REST program. IF SSVEC used REST funds, at the same level as for any other of its customers for these installations, then much of SSVEC's REST backlog for rebates would disappear and raising the cap would not be necessary.

Instead of \$1,045,000 each year from the Rest Budget going to pay off debt only at \$4 per watt approximately \$348,333 would be paid from the Rest Fund each year.

Sincerely,



Gail Getzwiller  
SSVEC Cooperative Member

Intervenor SSVEC REST CASE : Docket No. E-01575A-10-0308

Hand Delivered May 12, 2011

cc:

Original and 13 copies of the foregoing are mailed this date with:

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