



0000125646

ORIGINAL

RECEIVED

May 27, 2011

2011 JUN -3 P 2:05

Arizona Corporation Commission
DOCKETED

JUN 3 2011

DOCKETED BY

The Honorable Gary Pierce, Chairman
The Honorable Paul Newman
The Honorable Sandra D. Kennedy
The Honorable Bob Stump
The Honorable Brenda Burns
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

AZ CORP COMMISSION
DOCKET CONTROL

RE: Mohave Electric Cooperative request for approval of a waste-to-energy facility to be allowed under the REST.
Docket No. E-01750A-10-0453

Mr. Chairman and Commissioners,

I am writing to express my concerns about the proposal by Mohave Electric Cooperative to allow a waste-to-energy facility to be eligible (either through a waiver or as a pilot plant) as part of the Renewable Energy Standard and Tariff (REST). There are several reasons for my concern.

1. **Municipal Solid Waste is not a renewable energy resource.** Garbage produced by humans is not a renewable resource. Renewable resources are typically those that are "natural replenished" such as sunlight, wind, etc. The REST rules were designed to and allows for the Arizona Corporation Commission to add technologies to the list of eligible renewable energy resources so that the standard is flexible. However, allowing municipal solid waste (which is not a renewable resource) to be an eligible resource will open to door to other technologies that are also not renewable, thus creating a slippery slope.
2. **Waste-to-Energy facilities have historically been rejected in this state.** Over the past 25 years waste-to-energy facilities that will use municipal solid waste as a fuel source have been proposed. No plant, however, has ever been built in Arizona. Concerns about

these facilities have ranged from air emissions, lack of quality control on the type of feedstock that would be burned, financial difficulties, inability to secure a steady waste stream and public concern over burning garbage. I believe history should be an instructive guide to the Commission in this case.

3. The feedstock for the facility will vary and thus the emissions from the plant will vary.

While the applicant proposes to have a majority of the feedstock be from plant-based materials (biogenic) the waste stream from a city can contain plastics, metal, paper, cardboard, aerosol cans, pesticides, paints and any number of harmful materials.

Plastics when burned give off dioxins one of the most toxic substances known to man.

Release of heavy metals such as mercury, lead, and cadmium is also a concern. Unless the plant is limited to just plant-based materials for feed stock the emission from the plant will be unknown and therefore of concern.

For these reasons I respectfully request that the Commission deny the request to allow a waste-to-energy facility pilot program and deny granting a waiver to the REST to recognize the energy produced at the waste-to-energy facilities is an "Eligible Renewable Energy Resource."

Respectfully Submitted,



Amanda Ormond
Principal
Ormond Group LLC
7650 S. McClintock Drive
Ste 103-282
Tempe, Arizona 85283
480-491-3305