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Vote Solar

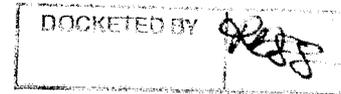


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Arizona Corporation Commission

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JUN 13 2011

AZ CORP COMMISSION  
DOCKET CONTROL

Chairman Gary Pierce  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007-2996

June 6, 2011

Re: Comments regarding Mojave Electric Cooperative's proposed waste-to-energy facility (Docket No. E-01750A-10-0453)

Dear Chairman Pierce,

On November 5, 2010, Mojave Electric Cooperative requested that the Commission provide a waiver of Renewable Energy Standard and Tariff (REST) regulations allowing power from a proposed waste-to-energy (WTE) garbage incineration facility to be considered an eligible renewable resource, or allowing that facility to be treated as a pilot program under the REST. On May 10, 2011, Commission staff recommended that the pilot program proposal not be approved, but recommended allowing the waiver and permitting 75% of the electricity from the plant to generate Renewable Energy Credits (RECs).

Vote Solar urges the Commission not to allow a waiver of the REST rules for this, nor any, WTE facility. WTE facilities should not be considered renewable, nor granted exceptions from renewable eligibility rules, for the following reasons:

- **Waste-to-energy plants are harmful to public health.** US EPA reports that in 2000, municipal waste combustion was the fourth largest source of the release of dioxin-like compound.<sup>1</sup> Dioxins are known to be potent carcinogens and are harmful to the immune system. Waste-to-energy facilities also release mercury, which ends up in groundwater or in surface waterways, where it accumulates into the fish Americans eat. Mercury exposure during fetal and child development can cause significant neurological damage and birth defects.
- **Waste-to-energy plants contribute to global warming.** As the Commission staff report noted, WTE generation emits more global warming gases than natural gas-fired generation. Research has found that even when carbon emissions from biogenic waste are excluded, carbon dioxide emissions from waste incineration still amount to 81% of emissions from the combustion of natural gas.<sup>2</sup> WTE generation should not be considered the only option to landfilling garbage, which also can result in global warming emissions; instead, incentives should be in place to maximize recycling and composting.
- **The demand created by Arizona's RES should be used to bring down the costs of emerging clean energy technologies.** By incenting renewable energy developers to compete for power demand, a RES

<sup>1</sup> See "More than half of the state Renewable Electricity Standards exclude municipal waste combustion as a renewable source of energy," by US PIRG, viewable at <http://www.sierraclub.org/committees/zerowaste/downloads/msw-statestandards.pdf>

<sup>2</sup> Ibid.

ensures the growth of cost-effective renewable energy capacity. As installed capacity grows, the cost of clean renewable energy moves toward parity with fossil fuel-fired electricity, setting the stage for a large-scale shift away from dirty energy sources. In contrast to emerging technologies like solar, waste-to-energy technology is already mature and well-commercialized and has been in use for decades, meaning that incenting further capacity via the RES will not significantly reduce future electricity costs.

We encourage you to keep Arizona's RES strong and protect public health and the environment by rejecting Mojave Electric Cooperative's requests.

Sincerely,

A handwritten signature in black ink, appearing to read 'SC', with a long horizontal flourish extending to the right.

Susannah Churchill, Solar Advocate  
The Vote Solar Initiative  
300 Brannan Street, Suite 609  
San Francisco, CA 94107

Cc: Commissioners' Offices, Arizona Corporation Commission  
Docket Control