



Tucson Electric Power Company
REST Implementation Plan
E-01933A-11-0269

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AZ CORP COMMISSION
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August 19, 2011

The Honorable Gary Pierce
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2927

Arizona Corporation Commission
DOCKETED

AUG 22 2011

DOCKETED BY 

Dear Chairman Pierce:

The Solar Store is an Arizona based company founded in 1998. I am writing you writing to express our objections to TEP's 2012 RES Implementation Plan for residents who choose to lease solar systems.

We feel strongly that a homeowner should receive the same incentive regardless of how they choose to finance their solar system.

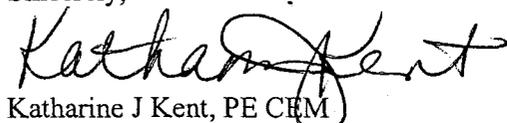
First, a residential solar system's installed cost is not a function of ownership; leased systems cost the same to install as systems that are purchased by homeowners outright. At the same time, leased systems by their nature provide additional benefits for homeowners, such as maintenance, insurance, and monitoring over the life of the lease.

Secondly, most residents in Arizona do not have the financial resources to purchase a solar photovoltaic system. In order to participate, they will require either financing or a leasing instrument. Lowering the incentive for leased systems essentially penalizes those customers for not having financial resources. This second class is not a fair and reasonable treatment.

Finally, TEP's proposal results in a policy-based competitive model between solar installers. Market-based competition is usually best for the consumer.

Thank you for your attention. Please feel free to contact me should you wish to discuss with me further.

Sincerely,



Katharine J Kent, PE CEM
President