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ARIZONA CORPORATION COMMISSION
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Arizona Corporation Commission
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December 12, 2011

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

Re: Comments on APS 2012 REST Implementation Plan, Docket No. E-01345A-11-0264

Dear Chairman Pierce and Commissioners:

I am submitting written public comments on the proposed APS 2012 Renewable Energy Standard and Tariff on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our 12,000 members, many of whom are APS customers.

The Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." The Sierra Club and our members have a significant interest in this plan as promoting renewable energy is a top priority for our chapter and for our organization overall.

The Commission has a critical role to play in advancing solar energy in our state as it is responsible for Arizona's Renewable Energy Standard. We are concerned that the Arizona Corporation Commission may be putting at risk solar energy investments and economic benefits to our state, however. These 2012 Renewable Energy plans set the stage for the coming years and help to determine how many solar rooftops we will see on our homes and businesses, how many jobs will be supported by the solar industry, and whether or not there will be stability in this important market. These plans also allow us to diversify our energy mix and take advantage of the benefits that solar energy provides to the grid, energy security, and price stability.

Arizonans have demonstrated over and over that they strongly support clean renewable energy such as solar – and that they are willing to pay for it too. Please support this important investment in Arizona's energy future and help foster the development of a world class solar industry in our state. Solar energy installations and manufacturing are critical components to a recovering economy and help to attract investment and innovation. This brings new products to the market and lowers the cost of solar energy - creating jobs and making solar more affordable for us all.

Without strong plans that maintain support for residential and commercial solar programs, this market could shrink.

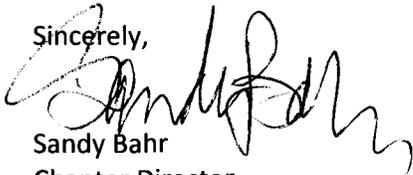
That would be devastating for a significant number of solar businesses and would represent a giant step backwards for Arizona.

While Staff's Option A may represent the bare minimum needed for sustaining Arizona's distributed solar energy industry, the Commission can and should do better, including providing additional dollars for residential funding in 2012 and ensuring that the 2012 solar capacity is at least as much as the 2011 capacity. We understand that the Commission must consider the ratepayers – as noted above, our members are APS ratepayers – when considering how much to do relative to providing solar incentives, but we urge you to look at doing more as it is clear there is support for it and that the benefits go well beyond individual installations. This is about building for our future about making infrastructure investments consistent with a new utility business model and structure.

Now is not the time to pull the rug out from under a growing solar distributed industry. We are on the cusp of making significant and sustainable breakthroughs, especially with the cost of solar technology continuing to decrease. Please do all you can to ensure that this industry and our use of clean, renewable solar energy in Arizona continue to grow.

Thank you for considering our comments.

Sincerely,



Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter