

**ORIGINAL**

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ARIZONA CORP COMMISSION  
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONER

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COMMISSIONER

BRENDA BURNS  
COMMISSIONER

IN THE MATTER OF THE )  
APPLICATION OF ARIZONA )  
PUBLIC SERVICE COMPANY )  
FOR APPROVAL OF ITS 2013 )  
RENEWABLE ENERGY )  
STANDARD IMPLEMENTATION )  
FOR RESET OF RENEWABLE )  
ENERGY ADJUSTOR )

DOCKET NO. E-01345A-12-0290  
*E-01345A-10-0394*  
COMMENTS OF SOLAR ENERGY  
INDUSTRIES ASSOCIATION (SEIA)

Please find attached hereto the comments of the Solar Energy Industries Association ("SEIA") in the above referenced docket.

Respectfully submitted this 12<sup>th</sup> day of October, 2012.

Court S. Rich  
Rose Law Group pc  
Attorney for Intervenor SEIA

Arizona Corporation Commission  
DOCKETED

OCT 12 2012

DOCKETED BY *TJM*

1 **Original and 13 copies filed on**  
2 **this 19<sup>th</sup> day of October, 2012 with:**

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 W. Washington Street  
6 Phoenix, Arizona 85007

7 *I hereby certify that I have this day served the foregoing documents on all parties of record in*  
8 *this proceeding by sending a copy via electronic and regular U.S. mail to:*

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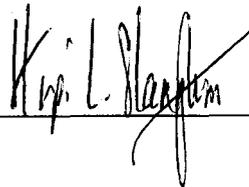
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October 12, 2012

Docket No.: E-01345A-12-0290

SEIA appreciates the effort that the REST Format Working Group put forward to make reading annual plans and reports easier and more informative. SEIA agrees overall with the format presented; however, SEIA strongly urges the inclusion of helpful statistics from past years in the reporting structure. Similar to Pinnacle West Capital Corporation and Unisource Energy Corporation’s annual 10-K filings, which have some tables going back 5 years, SEIA would like to see a historical look in REST related documents. In fact, during the stakeholder meeting that was our only request. Too often are stakeholders, Staff, and Commissioners unable to easily view what utilities have done and where they are going, especially in implementation plans. Therefore, SEIA recommends the following:

- Historic statistics including annual incremental capacity and equivalent number of projects *installed* in MW or kW, per REST program category, going back to the start of the REST. Additionally, inclusion of annual incremental capacity and equivalent number of projects *reserved*, per REST program category, in MW or kW.
- Future projections at least five years out for all market segments as shown in the filing.
- The budgets associated with each historical REST program category, for example:

		2008	2009	2010	2011	2012	2013	2014*
Residential Installed	MW	X MW						
Residential Budget	Incentive	\$X million						

\*Chart would continue to at least 2018 and have total columns.

As a secondary objective, SEIA would also like to see the following aggregated data posted quarterly on the [www.arizonagoessolar.org](http://www.arizonagoessolar.org) website:

- How much solar has been installed in Arizona in each market category, when it was built, and how much is projected going forward through reservations and in-construction projects.

Arizona has much to be proud of in terms of solar deployment; we should not keep the data hidden in dense bifurcated filings. Arizona also has important decisions that must be made and having data in an easy to digest format that provides historical context will help us make better informed decisions moving forward.

Thank you for your time and consideration of these comments.