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2013 MAY 31 P 4: 01

AZ CORP COMMISSION  
DOCKET CONTROL

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**BOB STUMP**  
**CHAIRMAN**

**GARY PIERCE**  
**COMMISSIONER**

**BRENDA BURNS**  
**COMMISSIONER**

**SUSAN BITTER SMITH**  
**COMMISSIONER**

**BOB BURNS**  
**COMMISSIONER**

10 IN THE MATTER OF THE APPLICATION  
11 OF ARIZONA PUBLIC SERVICE  
12 COMPANY FOR APPROVAL OF  
13 UPDATED GREEN POWER RATE  
14 SCHEDULES GPS-1, GPS-2 AND GPS-3.

DOCKET NO. E-01345A-10-0394

15 IN THE MATTER OF THE  
16 APPLICATION OF ARIZONA PUBLIC  
17 SERVICE COMPANY FOR APPROVAL OF  
18 ITS 2013 RENEWABLE ENERGY  
19 STANDARD IMPLEMENTATION FOR  
20 RESET OF RENEWABLE ENERGY  
21 ADJUSTOR

DOCKET NO. E-01345A-12-0290

22 IN THE MATTER OF THE APPLICATION  
23 OF TUCSON ELECTRIC POWER  
24 COMPANY FOR APPROVAL OF ITS 2013  
25 RENEWABLE ENERGY STANDARD  
26 IMPLEMENTATION PLAN AND  
27 DISTRIBUTED ENERGY  
28 ADMINISTRATIVE PLAN AND REQUEST  
FOR RESET OF ITS RENEWABLE  
ENERGY ADJUSTOR.

DOCKET NO. E-01933A-12-0296

IN THE MATTER OF THE APPLICATION  
OF UNS ELECTRIC, INC. FOR APPROVAL  
OF ITS 2013 RENEWABLE ENERGY  
STANDARD IMPLEMENTATION PLAN  
AND DISTRIBUTED ENERGY  
ADMINISTRATIVE PLAN AND REQUEST  
FOR RESET OF ITS RENEWABLE  
ENERGY ADJUSTOR.

DOCKET NO. E-04204A-12-0297

**SUMMARY OF TESTIMONY OF**  
**CARRIE CULLEN HITE** Arizona Corporation Commission

**DOCKETED**

MAY 31 2013

DOCKETED BY

1           Solar Energy Industries Association (“SEIA”), by and through its undersigned counsel  
2 hereby submits the Summary of the Testimony of Carrie Cullen Hitt.

3  
4           **Respectfully submitted** this 31<sup>st</sup> day of May, 2013.

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Court S. Rich  
Rose Law Group pc  
Attorney for SEIA

1 **Original and 13 copies filed on**  
2 **This 31<sup>st</sup> day of May, 2013 with:**

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

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

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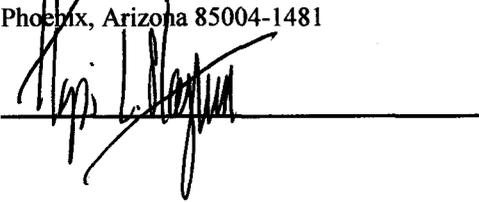
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**DOCKET NO. E-01345A-10-0394**  
**DOCKET NO. E-01345A-12-0290**  
**DOCKET NO. E-01933A-12-0296**  
**DOCKET NO. E-04204A-12-0297**

**SUMMARY OF TESTIMONY**  
**OF**  
**CARRIE CULLEN HITT**  
**ON BEHALF OF**  
**SOLAR ENERGY INDUSTRIES ASSOCIATION**

**MAY 31, 2013**

1 I have filed Direct and Rebuttal Testimony in this matter and offer the following  
2 summary of each.

3  
4 In my Direct Testimony I explained SEIA's recommendations as follows:

5 1. The Commission should take no action at this time regarding utility compliance with  
6 the Distributed Renewable Energy Requirement (the "carve out").

7 2. If the Commission does take action, the Commission should grant the Utilities a one  
8 year waiver from complying with the Distributed Renewable Energy Requirement.  
9 During the waiver period, the utilities would track the energy produced by distributed  
10 energy installations through the continued deployment of production meters and regularly  
11 report the amount of energy produced to the Commission. However, this information  
12 would not count towards the utilities' REST requirements. During this time the  
13 Commission can consider the best policy choices for continued distributed energy  
14 development in Arizona.

15 3. The Commission should not eliminate the Distributed Renewable Energy Requirement  
16 at this time.

17  
18 In my Rebuttal Testimony I explained that SEIA is concerned that the Track and Monitor  
19 solution proposed by Staff in the direct testimony of Robert Gray on April 24, 2013 may be  
20 considered double counting by Renewable Energy Credit ("REC") market participants.<sup>1</sup> If this  
21 were the case, Track and Monitor would likely devalue Arizona RECs and deprive REC owners  
22 of their property rights. We do not believe this to be the Arizona Corporation Commission's  
23 ("Commission") intent in this proceeding, and strongly urge the Commission to proceed with  
24 caution before implementing new policy that will impact Arizona's REC and renewable energy  
25 markets.

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<sup>1</sup> See Direct Testimony of Robert G. Gray Executive Consultant III Utilities Division Arizona Corporation  
Commission, April 24, 2013 at p. 7