

ORIGINAL



0000146501

ARIZONA CORPORATION COMMISSION  
ATTN: DOCKET CONTROL  
1200 WEST WASHINGTON STREET  
PHOENIX, ARIZONA 85007

RECEIVED

2013 JUL 11 P 3:25

Arizona Corporation Commission  
DOCKETED

JUL 17 2013

AZ CORP COMMISSION  
DOCKET CONTROL

THOMAS PATZKE, COMPLAINANT

VS.

DOCKETED BY  
NR

TUCSON ELECTRIC POWER COMPANY, RESPONDENT

DOCKET NO. E-01933A-12-0416

COMPLAINT NUMBER 105556

COMPLAINANTS PRE-FILED TESTIMONY FOR HEARING ON AUGUST 28, 2013

My case has been stated and documented to the Arizona Corporation Commission in previous filings dated September 19, 2012, and December 20, 2012.

There are no changes to the original testimony. TEP continues to arbitrarily withhold a balance of \$4,256.00 in "Upfront Incentive (UFI)" for my system installation under the 2011 RECPP and UFI agreements executed between the Complainant and the Respondent.

**Summary:**

Throughout the planning and construction process of my 18.4 KW Photovoltaic System I have relied on specific written guidance from TEP to construct my system and qualify for the Upfront Incentive (UFI) of \$2.00 per watt. This guidance was received from TEP's website and direct email communication with TEP. My system is built to code and TEP has accepted my system unconditionally. (Exhibit 1, Exhibit 2)

The written guidance I relied upon to self install portions of my system was found on TEP's website under [www.tep.com/renewable/home/pv](http://www.tep.com/renewable/home/pv) FAQ's (Exhibit 3). TEP places no limitations on owner/self installed systems, as long as they meet code and nowhere does TEP limit the UFI for self installed systems. There is no prohibition of combining self install and using a qualified installer on the same system either, which I had elected to do.

The fact that my system was self installed in cooperation with a qualified installer was disclosed to TEP well before my system was accepted by TEP and UFI checks were issued. (Exhibit 4)

All of my system costs were submitted to TEP by my installer and myself. Where questions arose, I pro-actively requested clarification from TEP and complied accordingly. (Exhibit 5, e-mail exchange with Blanca Anderson from TEP). All of my system costs were subsequently accepted by TEP in writing! (Exhibit 1, Exhibit 2) Two UFI checks were then correctly issued by TEP: One for \$32,544, initially paid to TFS per "Assignment of Payment" and subsequently re-issued to Thomas Patzke and a second one in the amount of \$4,256 to TFS, for a total of \$36,800 -- the total UFI due Patzke, per RECPP contract.

TEP, for reasons I can only speculate, intervened after their second check issue as TFS (my qualified installer) informed me that they were re-directing the final check issued to them back to me. TFS was no longer owed any money and all outstanding demands between TFS and Patzke had been mutually agreed to and settled through direct payment by Patzke to TFS.(Exhibit 6). TEP then refused to re-issue the check to me and the amount of \$4,256.00 is still outstanding. TEP did not produce meaningful reference or other governing documents that would show why my UFI is being reduced and by how much. The reduction in UFI was therefore arbitrary and violates my agreements with TEP.

### ESTOPPEL REQUEST

Before issuance of the final check by TEP to TFS, and prior to specifically accepting my system with all of my submitted costs, I directed numerous written disclosures and "good faith efforts to comply" to TEP. I am respectfully asking the court to estop TEP from using those prior disclosures to retrospectively limit my UFI payments, since TEP could have responded when the disclosures were made. This would include the following:

- Portions of the system were self installed without a qualified installer.
- Costs incurred during self install are not accepted.
- Nepotism: You can't have your kids help with work and pay them...
- We don't pay for gravel application for fire and erosion control on a ground mount system.
- TFS agreed to an installation discount that distorted the real costs of the system, therefore inflating the UFI.
- Receipts were not provided, when in fact they were never asked for or required: An "outline" was asked for by Ms Andersen from TEP (Exhibit 5)
- Corrected Certificates of Completion are not allowed or are limited in number.

I am also asking the court to reject TEP's effort to limit my UFI for any reason given by TEP that cannot be reconciled back to the RECPP and other supporting documents and

publications, readily available to the consumer. Otherwise TEP will continue to make up reasons to arbitrarily limit UFI's.

DECLARATION

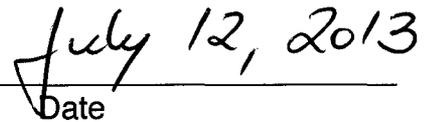
I am filing two Affidavits from neighbors with self-installed systems, in support of the fact that TEP does not prohibit and/or limit the UFI for self-installed/owner installed systems, provided they "follow applicable codes and standards."

Exhibit 7 and Exhibit 8.

Respectfully submitted,



\_\_\_\_\_  
Thomas Patzke



\_\_\_\_\_  
Date

Exhibit 1



**BRIGHT SOLUTIONS™**  
from Tucson Electric Power

April 9, 2012

Thomas A Patzke  
12951 N Tailwind Dr  
Oro Valley, Az 85737

RE: Installation Address: 12951 N Tailwind Dr  
Installer: TFS

Dear Thomas A Patzke:

Your Residential Solar Photovoltaic (PV) system meets all specifications outlined in Tucson Electric Power's (TEP) Renewable Energy Credit Purchase Program (RECPP) Up-Front Incentive (UFI) Agreement, a copy of which is enclosed for your records. All other conditions of our program also have been met, including successful completion of code inspections.

Your incentive check has been issued in accordance with instructions provided during the application process. Payment will be sent to the appropriate entity within three weeks of the date of this letter. Additionally, TEP will file and issue a 1099-MISC form for this payment, as required by the Internal Revenue Service. A copy of this form will be issued no later than January 31st of the following year.

This letter serves as permission to operate the photovoltaic generating system installed at 12951 N Tailwind Dr in parallel with TEP's electric distribution system. TEP's authorization for the operation of this facility is subject to all the terms and conditions of the RECPP UFI Agreement and Interconnection requirements contained within.

Thank you for your interest in TEP's renewable energy program. If we can be of further assistance, please visit us at [tep.com](http://tep.com) or contact one of our customer service representatives at (520) 917-3673.

Sincerely,

The TEP Renewable Resource Team

Enclosure

CTilghman@Tep.com

March 30, 2012 4:36 PM

To: <thpatzke@aol.com>

Cc: <kevin@tfssolar.com>, <BAnderson@tep.com>

Solar Incentive

---

Dear Sir,

I have reviewed your file regarding your request for the inclusion of additional expenses on your solar system. Our records indicate that you have already received an incentive check in the amount of \$32,544.00. The maximum amount of incentive to be received from the 18.4 kW PV system, at \$2.00 per watt, is \$36,800.

Although I find several of your expenses to be questionable, I have spoken to the owner of Technicians for Sustainability and he has testified that most of the expenses seem reasonable. As such, I am authorizing the remaining \$4,256 be paid directly to Technicians for Sustainability, the rightful owner of all incentives associated with this installation, as authorized by you on July 21, 2011 on the Assignment of Payment form submitted along with your application.

No further action is required on your part regarding this matter, and TEP now considers this matter closed. Thank you.

Carmine A. Tilghman  
Director - Renewable Resources & Programs  
UniSource Energy  
Office: (520) 745-7108  
Cell: (520) 906-4343  
Fax: (520) 545-1536

Exhibit 3

Home Programs

- Bright Tucson Community Solar
- Solar Hot Water / Space Heating
- Solar Electric Photovoltaic (PV)

Business Programs

Tools and Resources

Reports

# Solar Electric Photovoltaic (PV) Systems

## Incentives for solar panel installation on your home.

TEP is offering incentive payments for residential PV systems to encourage the installation of solar power. Up-front incentives are available for grid-tied systems up to 30 kW DC. Grid-tied systems are connected to TEP's distribution system through an electrical panel.

www.tep.com  
/renewable  
/home  
/pv

OVERVIEW

FAQS

TECHNICAL REQUIREMENTS

INSTALLER RESOURCES

### What size system will I need?

A typical Tucson household uses about 11,000 kilowatt hours (kWh) of electricity per year. One kilowatt of solar power will produce approximately 1,700 kWh per year. Your system size will depend on how much of your power you would like to generate with solar and on the availability of unshaded space on your rooftop. A field visit with a qualified installer will help determine an appropriate system size.

To request an electricity consumption report specific to your house contact us. These reports cost \$8.00. TEP does not recommend a solar electric system that exceeds annual power usage.

### How do I find a contractor/installer and what qualifications do they need?

The contractor installing your system must have a license from the Arizona Registrar of Contractors (AZROC) that authorizes them to install the kind of system that you purchase. This is necessary to receive an incentive under the Renewable Energy Credit Purchase Program (RECPP). TEP does not endorse any contractor/installer. A customer may hire any qualified, licensed contractor of their choice. TEP does require the installer to also possess an Arizona business license that is active and in good standing.

Contractors are required to pass a solar trade exam with the AZROC in order to obtain the proper license classification. Some license classifications can be confusing and a contractor's license status may change at any given time. Please refer to the Arizona Registrar of Contractors website for the most up to date information and for appropriate licensing guidelines at AZROC.

TEP recommends that customers meet with at least three licensed solar installers. Evaluate each candidate's experience and consider other factors such as: Do they have any unresolved complaints, judgements or liens? Will they provide a list of references?

### What is the application process?

Download a copy of the application process – PDF 75 KB

### How quickly must I have my system installed?

Residential customers have 180 days to install their system and pass code and technical inspections.

Extensions will generally not be granted. However, under some extenuating circumstances an extension may be considered. When an extension is requested it must be submitted to TEP in writing and include the reason for the request. Please be aware extensions are granted solely at the discretion of TEP.

### How is the incentive payment from TEP calculated and when can I expect payment?

1. Determine the system capacity size

PV Panel Nameplate Rating (#watts) X quantity of panels = system capacity size

Do all systems need to meet the UL-1703 standard?

Exhibit 3/p2

Yes. All photovoltaic modules must be certified by a nationally recognized testing laboratory as meeting the requirements of UL-1703. All other electrical components must be UL listed. This includes the inverter, which must be certified as meeting the requirements of IEEE-1547 and must be UL-1741 certified.

Does TEP allow customers to self-install PV systems?

Yes. Installation must follow applicable codes and standards. TEP reserves the right to discontinue this option if TEP finds self-installed systems do not adhere to applicable codes and standards or exhibit poor quality workmanship.

What are the available state and federal tax credits?

Consult with a tax professional about current tax credits available to you for a renewable energy system. You can also view federal and state tax credits at [dsireusa.org](http://dsireusa.org).

Am I really making a difference in the environment if I install a solar PV system?

Absolutely! As customers use the energy from their solar PV systems, they use less power from the utility. This allows us to reduce the amount of fuel used at our power plants, thus reducing emissions. Together, we are working today for a bright tomorrow.

Are there additional resources that I can review?

**Buyers Guide for Consumers**

**Solar Electric Power Association**

**Southern Arizona Solar Standards Board:** promotes best practices in the solar electric/hot water industry.

Visit the Southern Arizona Solar Standards Board website to learn more about best practices in solar installation.

Exhibit 4

BAnderson@tep.com  
To: <thpatzke@aol.com>  
Cc: <kpatzke@aol.com>  
RE: Patzke TEP rebate

February 15, 2012 9:00 AM

Mr. Patke: Good morning. We have a significant change from the first submission to the final submission of the COC. I am happy to reissue monies if necessary; however, I need to have an outline of the nearly \$10,000 difference. Understandably travel and the pressure from TEP to get things paid in 2011 made the communications more difficult and for my part I certainly apologize; however, the resolution will remain the same. Is this outline something that TFS can provide or you can send me?

Please let me know how I can help.

BA

**From:** Tom Patzke [mailto:thpatzke@aol.com]  
**Sent:** Wednesday, February 15, 2012 8:30 AM  
**To:** Anderson, Blanka  
**Cc:** kpatzke@aol.com  
**Subject:** Patzke TEP rebate

Disclosure to TEP reference  
self-install

Blanka,

at the bottom of this email, you will find correspondence between Erika from TFS and myself. As a matter of explanation it is important to note that TFS was the contractor on this job, but that certain items, like grubbing, clearing, grading, trenching, conduit installation, foundation prep, pouring concrete footers, steel for rack, rack mounting etc, etc. were subcontracted by me and not by TFS. Final accounting and billing for those items was coming from me to TFS.

Our PV system was commissioned by TEP and taken live on December 28, 2011. During this time I was vacationing in Northern Idaho. After the New Year Holiday, Erika called to ask me for receipts of items subcontracted by me. Since I was in Idaho and not in Tucson, where all the records are, I told Erika that I would get all billing to her upon my return and as soon as all invoices are in my possession.

I do not understand where the sudden rush came from, but as you can see below, Erika proceeded to submit COC numbers to you, without waiting for final accounting from me. As soon as she told me that, I asked her immediately to rescind the submission to TEP, since it was incomplete and would result in a large rebate error. (See below.)

Erika then told me that she had communicated with you and that upon her receipt of final invoicing from me, she would submit that invoice to TEP and you offered to re-open the file. I subsequently sent Erika my final invoicing for \$16,328.00, which she had promised to forward to you.

I was surprised, when TEP issued their check to TFS, without consideration of the final invoice amount.

Per TFS final calculation, our System Costs were \$73,381.00

Blanka, the TEP rebate check was made out to TFS and since my account with TFS was settled, they endorsed your rebate check in the amount of \$32,544.00 and sent it to me. Wells Fargo Bank will not accept that check from me and I am suggesting that I send the check back to you for reissue.

Please advise.

Call with any questions you may still have.

Regards,

Tom Patzke

Exhibit 5 (6 pages)

Tom <ThPatzke@aol.com>  
To: "<BAnderson@tep.com>" <BAnderson@tep.com>  
Cc: "<kpatzke@aol.com>" <kpatzke@aol.com>  
Re: Patzke TEP rebate

February 17, 2012 12:11 PM



Thanks -- no problem! Talk to you next week and will hang on to original rebate check.

Regards,  
Tom Patzke  
714-8765949

On Feb 17, 2012, at 11:11, <BAnderson@tep.com> wrote:

Mr. Patzke: I've worked with Accounting to re-issue the original check to you (in your name). Unfortunately this error is corrected in bits and pieces by virtue of the computer system we have here at TEP. The remainder is under review with my supervisor and will be processed next week.

I apologize for the delay in responding. I have been working on this behind the scenes.

Thanks,

Blanka

---

**From:** Tom [mailto:thpatzke@aol.com]  
**Sent:** Friday, February 17, 2012 11:06 AM  
**To:** Anderson, Blanka  
**Cc:** Karin Patzke  
**Subject:** Fwd: Patzke TEP rebate

Blanka,

I am resending my email from two days ago: just wanted to be sure that you received it, since I had not heard from you.

Thank you.

Than

Regards,  
Tom Patzke  
714-8765949

Begin forwarded message:

**From:** Tom Patzke <thpatzke@aol.com>  
**Date:** February 15, 2012 12:14:50 MST  
**To:** BAnderson@tep.com  
**Cc:** kpatzke@aol.com  
**Subject:** Re: Patzke TEP rebate

Blanka,

The breakdown is as follows:

# Final Invoices Patzke Solar

*Exhibit 5/p2*

## Patzke Solar

	Rate per Day/hrs	Units	Charge
Gannon Rental, AJ Leasing	\$200.00	6	\$1,200.00
Dump Trailer Rental, AJ Leasing	\$95.00	12	\$1,140.00
Skid Steer/Forks, AIM Services	\$200.00	32	\$6,400.00
Horizon Steel, pipe Fab, deliver			\$1,600.00
Fuel			\$150.00
Pioneer Rock, Gravel			\$1,213.00
Kris Lavandero, Supervision, Labor	\$35.00	80	\$2,800.00
Nick Patzke, Labor	\$25.00	38	\$950.00
Chris Patzke, Labor	\$25.00	35	\$875.00
<b>Sub-Total</b>			<b>\$16,328.00</b>

TFS original COC submitted	\$65,088.00
Missing Invoices from Patzke	\$16,328.00
Credit from TFS Settlement	- \$ 8,035.00
<u>Total System Cost</u>	<u>\$73,381.00</u>

TFS settlement  
disclosed



The "Credit from TFS Settlement" pertains to a labor invoice from TFS to me that was included in the original \$65,088.00 submission to TEP. That invoice was subsequently reduced by \$8,035.00, therefor reducing the cost of my system and explaining the credit.

I have attached a spreadsheet of final costs that TFS did not submit in their original submission of COC to you: \$16,328.00 This information you should have already had, according to Erika from TFS, since she told me it had been forwarded to you.

Blanka, again, it is unfortunate that TFS chose to hastily submit a COC to you, without having accounted for all costs. "Haste makes waste" and this is a prime example. I don't understand the rush...?!

Again, I have been unable to deposit your original check for \$32,544.00, because it was made out to TFS and then endorsed to me, which is unacceptable to Wells Fargo. All my accounts with TFS are settled and it would be better, if I return your rebate check in exchange for a corrected check.

I hope this is the "outline" you were looking for. Thanks and sorry for all the extra work we are going through.

Regards,

Tom Patzke  
714-8765949

-----Original Message-----

From: BAnderson <BAnderson@tep.com>  
To: thpatzke <thpatzke@aol.com>  
Cc: kpatzke <kpatzke@aol.com>  
Sent: Wed, Feb 15, 2012 9:25 am  
Subject: RE: Patzke TEP rebate

Yes. There's a significant change. I understand missing a few hundred dollars but we speaking of thousands from the first to the second to the third submission. I am sure you understand I need to be able to defend/explain the difference should auditing question me the person that made the payment.

Thank you so much for your help.

BA

---

**From:** Tom [mailto:thpatzke@aol.com]  
**Sent:** Wednesday, February 15, 2012 9:20 AM  
**To:** Anderson, Blanka  
**Cc:** <kpatzke@aol.com>  
**Subject:** Re: Patzke TEP rebate

When you say "outline", do you mean additional invoice from first submission? If so, yes I can send that.

Regards,  
Tom Patzke  
714-8765949

On Feb 15, 2012, at 8:56, <BAnderson@tep.com> wrote:

Mr. Patke: Good morning. We have a significant change from the first submission to the final

submission of the COC. I am happy to reissue monies if necessary; however, I need to have an outline of the nearly \$10,000 difference. Understandably travel and the pressure from TEP to get things paid in 2011 made the communications more difficult and for my part I certainly apologize; however, the resolution will remain the same. Is this outline something that TFS can provide or you can send me?

Please let me know how I can help.

BA

---

**From:** Tom Patzke [mailto:thpatzke@aol.com]  
**Sent:** Wednesday, February 15, 2012 8:30 AM  
**To:** Anderson, Blanka  
**Cc:** kpatzke@aol.com  
**Subject:** Patzke TEP rebate

Blanka,

at the bottom of this email, you will find correspondence between Erika from TFS and myself. As a matter of explanation it is important to note that TFS was the contractor on this job, but that certain items, like grubbing, clearing, grading, trenching, conduit installation, foundation prep, pouring concrete footers, steel for rack, rack mounting etc, etc. were subcontracted by me and not by TFS. Final accounting and billing for those items was coming from me to TFS.

Our PV system was commissioned by TEP and taken live on December 28, 2011. During this time I was vacationing in Northern Idaho. After the New Year Holliday, Erika called to ask me for receipts of items subcontracted by me. Since I was in Idaho and not in Tucson, where all the records are, I told Erika that I would get all billing to her upon my return and as soon as all invoices are in my possession.

I do not understand where the sudden rush came from, but as you can see below, Erika proceeded to submit COC numbers to you, without waiting for final accounting from me. As soon as she told me that, I asked her immediately to rescind the submission to TEP, since it was incomplete and would result in a large rebate error. (See below.)

Erika then told me that she had communicated with you and that upon her receipt of final invoicing from me, she would submit that invoice to TEP and you offered to re-open the file. I subsequently sent Erika my final invoicing for \$16,328.00, which she had promised to forward to you.

I was surprised, when TEP issued their check to TFS, without consideration of the final invoice amount.

Per TFS final calculation, our System Costs were \$73,381.00

Blanka, the TEP rebate check was made out to TFS and since my account with TFS was settled, they endorsed your rebate check in the amount of \$32,544.00 and sent it to me. Wells Fargo Bank will not accept that check from me and I am suggesting that I send the check back to you for reissue.

Please advise.

Call with any questions you may still have.

Regards,

Tom Patzke  
714-8765949

-----Original Message-----

Tom <ThPatzke@aol.com>  
To: "<BAnderson@tep.com>" <BAnderson@tep.com>  
Cc: "<kpatzke@aol.com>" <kpatzke@aol.com>  
Re: Incentive payment

February 14, 2012 7:16 PM



Blanka,

Can we talk on the phone in the morning? I can give you a little more background information and you can give me some more guidance on what you want me to outline and how to do it.

Regards,  
Tom Patzke  
714-8765949

On Feb 14, 2012, at 16:36, <BAnderson@tep.com> wrote:

Mr. Patke: Thank you for communication. Understandably we have changes in costs; however, once a file has been paid and needs to be re-opened with such drastic changes an outline of the reasons will need to be submitted. As a regulated utility all files must be complete and follow a clear trail should auditing question any step taken in the process.

I can assure you that TFS submitted the COC in a timely manner as is the normal course of business for them. Especially timely under my direction to get everything from 2011 submitted in order to be paid in 2011.

If you can send me an outline of the changes in costs as requested above, we can review and process accordingly. I'll need also to arrange for your 1099 to reflect the new incentive amount as well.

Have a nice evening.

Blanka Anderson  
REST/Residential Coordinator

---

**From:** Tom [mailto:thpatzke@aol.com]  
**Sent:** Monday, February 13, 2012 3:15 PM  
**To:** Anderson, Blanka  
**Cc:** Karin Patzke  
**Subject:** Re: Incentive payment

Blanka,

Thanks so much for going through the effort of re-auditing our project.

The initial certificate of completion was hastily submitted by TFS, our contractor, did not include all invoices and was incomplete. That started the confusion.

Please let me know if I can help with documents or explanations of what happened or what was submitted.

Thanks again.

Regards,

Exhibit 5/p6

Tom Patzke  
714-8765949

On Feb 13, 2012, at 15:32, <[BAnderson@tep.com](mailto:BAnderson@tep.com)> wrote:

Mr. Patzke: Good afternoon. I will go ahead and pull your file and review the project costs again. I did receive multiple Certificates of Completion for your project and believe that the final COC was sent AFTER I had already paid the project out. Please let me review this carefully and get back with you in the morning. If needed, I will also arrange for a corrected W-9 to be sent.

Thanks,

Blanka Anderson

# Exhibit 6

Kevin Koch <kevin@fssolar.com>  
To: Thomas Patzke <thpatzke@aol.com>  
Cc: "CTilghman@tep.com" <CTilghman@tep.com>  
TEP incentive

April 27, 2012 6:57 AM

Dear Mr. Patzky,

We are mailing a check to you for the additional TEP incentive we were sent as a result of the additional costs you submitted to them. While we do not feel that you have paid the appropriate balance for the work we completed, we did say that you should pay us what you think is fair, and we will abide by that statement. However, in turning the incentive payment over to you, we are in no way acknowledging that the additional costs you submitted to TEP for your project are legitimate, nor are we accepting any responsibility should those expenses at some time be deemed fraudulent or otherwise not supported by the accounting and expenses you provided to TEP.

Kevin Koch  
Technicians for Sustainability  
612 N 7th Ave., Tucson, AZ 85705  
[\(520\)740-0736](tel:(520)740-0736)  
[www.fssolar.com](http://www.fssolar.com)

**ARIZONA CORPORATION COMMISSION  
ATTN: DOCKET CONTROL  
1200 WEST WASHINGTON STREET  
PHOENIX, ARIZONA 85007**

**THOMAS PATZKE, COMPLAINANT**

VS.

**TUCSON ELECTRIC POWER COMPANY, RESPONDENT**

DOCKET NO. E-01933A-12-0416

COMPLAINT NUMBER 105556

DECLARATION by Philip J. Parish

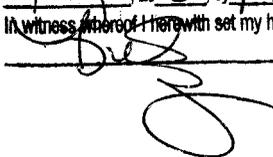
My name is Philip J. Parish. I live in the same community as Mr. Patzke. My PV system is 18.4 KW and identical in size to Mr. Patzke's. It has a similar layout and was installed in the same manner as Mr. Patzke's system. I worked with the same qualified installer and my family and I did some of the work in an effort to save costs. My system was accepted unconditionally by TEP several weeks after Mr. Patzke's system. My installation costs were comparable to Mr. Patzke's and were provided in exactly the same format as Mr. Patzke's. I was paid my full UFI credit in the amount of \$36,800.00 without any offsets or limitations.

I declare the foregoing to be true and correct.

  
\_\_\_\_\_

Philip J. Parish  
13330 N. Pilot Dr  
Oro Valley, AZ 85755  
520-250-1567

STATE OF ARIZONA }  
COUNTY OF PINA } SS

This instrument was acknowledged before me on the 9<sup>th</sup> day of July, 2013, by Philip J Parish  
In witness whereof I here with set my hand and official seal  
  
NOTARY PUBLIC

7-9-2013  
Date

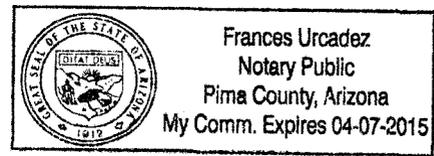


Exhibit 8

ARIZONA CORPORATION COMMISSION  
ATTN: DOCKET CONTROL  
1200 WEST WASHINGTON STREET  
PHOENIX, ARIZONA 85007

THOMAS PATZKE, COMPLAINANT

VS.

TUCSON ELECTRIC POWER COMPANY, RESPONDENT

DOCKET NO. E-01933A-12-0416

COMPLAINT NUMBER 105556

DECLARATION by Jim Caffall

My name is Jim Caffall. I am a close neighbor to Mr. Patzke. I have a 15.2 KW, roof mounted PV system. The system was mostly installed by myself as the home owner and some work was performed by an Electrician. My system was accepted by TEP on March 11, 2011. My installation costs were submitted to Ms Blanka Anderson in a personal meeting.

My UFI credit in the amount of \$43,263 included a 5% derate per TEP de-rate chart due to reduced panel tilt of less than 20 degrees. No adjustment to my UFI was made because I self installed my system.

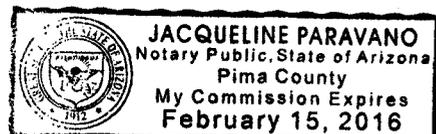
I declare the foregoing to be true and correct.

*Jim Caffall*

7-12-13

Date

Jim Caffall  
1800 W Moore Rd  
Tucson, AZ 85755  
520-9071383



This instrument was acknowledged before me on the 12<sup>th</sup> day of July, 2013, by Jim Caffall. In witness whereof I hereby set my hand and official seal.  
Paravano NOTARY PUBLIC