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E-01345A-10-0394
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OFFICE OF
AIR AND RADIATION

Arizona Corporation Commission
DOCKETED

JUL 24 2013

DOCKETED BY
NR

Mr. Bob Stump
Chairman
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Subject: Using "Track and Record" for compliance with the distributed generation portion of the Arizona Renewable Energy Standard (Docket Nos. E-01345A-10-0394 et al.)

Dear Chairman Stump:

The U.S. Environmental Protection Agency (EPA) is writing to express concern with the proposed shift to a Track and Record method for utilities to demonstrate compliance with the distributed generation (DG) portion of the state's Renewable Energy Standard and Tariff (REST) instead of the current practice of procuring and retiring Renewable Energy Certificates (RECs).

EPA supports the development of clean, renewable energy resources for electric power generation through the national voluntary program – the Green Power Partnership – which recruits commercial, institutional and governmental organizations to increase their use of renewable electricity. Currently, EPA partners with over 1,400 organizations that purchase or self-generate more than 27 billion kWh of green power annually. These renewable electricity purchases were equal to 0.6% of U.S. electricity sales in 2011 and are above-and-beyond regulatory requirements.

Track and Record, as proposed, would open the door to double-counting the voluntary purchases and the self-generation of renewable electricity from Arizona DG systems that may be in excess of state mandates by allowing utilities to tally the same renewable electricity generation toward meeting their REST requirements. To protect its Partners' ability to make environmental claims, the Green Power Partnership would have to revise programmatic eligibility standards to exclude renewable electricity generated from DG systems in Arizona. This could negatively impact those Green Power Partners operating in Arizona and any out-of-state Partners currently procuring RECs from Arizona. EPA would rather not take this step, as it would narrow the options available to our Partners. It is in the interest of avoiding that possibility that we provide our comments on this issue.

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We appreciate the opportunity to share our concerns, and trust that the Commission will consider them in reaching a final decision on this matter.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Craig". The signature is written in a cursive style with a large, looping initial "E".

Elizabeth Craig, Director
Climate Protection Partnerships Division

cc: Commissioner Susan Bitter Smith
Commissioner Brenda Burns
Commissioner Bob Burns
Commissioner Gary Pierce

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