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AZ CORP COMMISSION  
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Arizona Corporation Commission

DOCKETED

JUL 15 2013

BEFORE THE

ARIZONA CORPORATION COMMISSION

DOCKETED BY	nr
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IN THE MATTER OF THE COMMISSION'S )  
 INQUIRY INTO RETAIL ELECTRIC ) DOCKET NO. E-00000W-13-0135  
 COMPETITION )  
 )  
 ) NOTICE OF FILING  
 )

Arizona Solar Deployment Alliance ("ASDA") hereby files comments in the above captioned proceeding in accordance with the letter from the Executive Director of the Arizona Corporation Commission ("ACC") dated May 23, 2013. ASDA is an Arizona Non-Profit Corporation that was formed to focus on the expansion of distributed photovoltaic markets to create jobs and economic development in Arizona. The board of directors is comprised of representatives from Arizona owned and controlled companies involved in the solar industry.

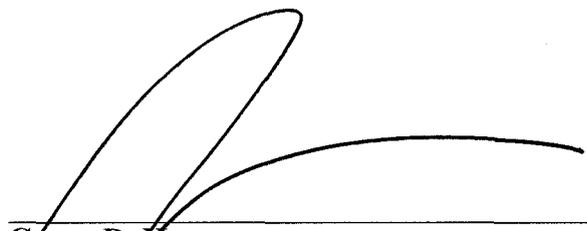
ASDA, by and through its counsel undersigned, requests to be added to the service list of the above captioned docket and requests that all communication in connection with the proceeding be directed to:

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RESPECTFULLY SUBMITTED this 15th day of July, 2013

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By: *Lindsay Springer*  
Lindsay Springer  
Paralegal to Garry D. Hays

**Generic Docket No: E-00000W-13-0135/In the Matter of the Commission's  
Inquiry into Retail Electric Competition**

1. Will retail electric competition reduce rates for all classes of customers-residential, small business, large business and industrial classes?

**Arizona Solar Deployment Alliance ("ASDA") does not have sufficient information available to answer this question at this time. ASDA looks forward to reviewing other stakeholders responses and filing additional comments on August 16, 2013.**

2. In addition to the possibility of reduced rates, identify any and all specific benefits of retail electric competition for each customer class.

**See Response to Question 1.**

3. How can the benefits of competition apply to all customer classes equally or equitably?

**See Response to Question 1.**

4. Please identify the risks of retail electric competition to residential ratepayers and to the other customer classes. What entity, if any, would be the provider of last resort?

**See Response to Question 1.**

5. How can the Commission guarantee that there would be no market structure abuses and/or market manipulation in the transition to end implementation of retail electric competition?

**See Response to Question 1.**

6. What, if any, features, entities or mechanisms must be kept in place to order for there to be an effective and efficient market structure for retail electric competition? How long would it take to implement these features, entities, or mechanisms?

**See Response to Question 1.**

7. Will retail electric competition require the divestiture of generation assets by regulated electric utilities? How would FERC regulation of these facilities be affected?

**See Response to Question 1.**

8. What are the costs of the transition to retail electric competition, how should those costs be quantified, and who should bear them?

**See Response to Question 1.**

9. Will retail electric competition impact reliability? Why or why not?

**See Response to Question 1.**

10. What are the issues relating to balancing area authorities, transmission planning, and control areas which must be addressed as part of a transition to retail electric competition?

**See Response to Question 1.**

11. Among the states that have transitioned to retail electric competition, which model best promotes the public interest for Arizonans? Which model should be avoided?

**See Response to Question 1.**

12. How have retail rates been affected in states that have implemented retail electric competition?

**See Response to Question 1.**

13. Is retail electric competition viable in Arizona in light of the Court of Appeal' decision in *Phelps Dodge Corp. v. Ariz Elec. Power Coop.*, 207 Ariz. 95, 83 P.3d 573 (App. 2004)? Are there other legal impediments to the transition to and/or implementation of retail electric competition?

**See Response to Question 1.**

14. Is retail electric competition compatible with the Commission's Renewable Energy Standard that requires Arizona's utilities serve at least 15% of their retail loads with renewable energy by 2020? (See A.A.C. R14-2-1801 et seq.)

**The Commission's Renewable Energy Standard (RES) supports the fundamental charge given to the Commission under Article 15, Section 3 of Arizona's Constitution to "make and enforce reasonable rules, regulations, and orders for the convenience, comfort, and safety, and the preservation of the health, of the employees and patrons" of public service corporations. Adoption and continued implementation of the RES supports this charge in several ways.**

**The RES diversifies the location and fuel source of Arizona's electrical generation facilities. Renewable energy systems using in-state fuel sources like solar, wind and biomass are distributed throughout the state. Additionally, rooftop solar generates electricity inside the load pocket, not out in a remote section of the state that requires miles of transmission lines to get to the ratepayer. No longer is our generation infrastructure located at a handful of facilities and that leads to increased safety for all customers connected to the grid.**

**Arizonans will still rely on nuclear and coal for much of the baseload, but the last several years has shown that renewable energy, specifically solar, has a place in the electric generation portfolio. Keeping the RES allows this diversity of electrical sources.**

**If the Commission decides to continue with its investigation into retail competition, the RES should be carried forward and implemented in a similar fashion on all retail electricity providers. It can be assumed that some renewable energy companies will become retail providers but it is not the intent or the goal of the members of ASDA to perform that function.**

15. Is retail electric competition compatible with the Commission's Energy Efficiency Standard that requires Arizona's electric utilities to achieve a 22% reduction in retail energy sales by consumption by 2020? (See A.A.C. R14-2-2401 et seq.)

**See Response to Question 1.**

16. How should the Commission address net metering rates in a competitive market?

**Net Metering is an important component of Arizona's comprehensive energy framework. On July 12, 2013 APS filed proposals to change net metering in Arizona. ASDA understands that hearings will be held at the ACC in the near future to discuss APS' proposals. During these hearings, the ALJ could instruct the parties to put on evidence that discusses this very topic. ASDA plans to fully participate in the proceedings regarding net metering at the Commission. Because of this, ASDA has not yet formalized an opinion on the answer to this question but is continuing to gather information in order to articulate a position on this topic in future proceedings.**

17. What impact will retail electric competition have on resource planning?

**See Response to Question 1.**

18. How will retail electric competition affect the public power utilities, cooperatives and federal controlled transmission systems?

**See Response to Question 1.**