

**INTERVENTION
ORIGINAL**



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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

7 Bob Stump, Chairman
8 Gary Pierce, Commissioner
9 Brenda Burns, Commissioner
10 Bob Burns, Commissioner
11 Susan Bitter Smith, Commissioner

Arizona Corporation Commission

DOCKETED

AUG 29 2013

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12 IN THE MATTER OF THE
13 APPLICATION OF ARIZONA PUBLIC
14 SERVICE COMPANY FOR APPROVAL
15 OF NET METERING COST SHIFT
16 SOLUTION.

Docket No. E-01345A-13-0248

17 **APPLICATION OF THE INTERSTATE RENEWABLE ENERGY COUNCIL,
18 INC. FOR LEAVE TO INTERVENE**

19 Pursuant to A.A.C. R14-3-105, the Interstate Renewable Energy Council, Inc.
20 (IREC) hereby applies to the Arizona Corporation Commission (Commission) for an
21 order granting it leave to intervene in the above-captioned proceeding. Concurrent with
22 this application, IREC is filing a Protest in this proceeding.

23 Rule 14-3-105 provides that "persons, other than the original parties to the
24 proceedings, who are directly and substantially affected by the proceedings, shall secure
25 an order from the Commission or presiding officer granting leave to intervene before
26 being allowed to participate." IREC is a 501(c)(3) non-profit organization whose goal is
to enable greater use of clean energy in a sustainable way by (1) introducing regulatory
policy innovations that empower consumers and support a transition to a sustainable
energy future, (2) removing technical constraints to distributed energy resource
integration, and (3) developing and coordinating national strategies and policy guidance

1 to provide consistency on these policies centered on best practices and solid research. The
2 scope of IREC's work includes expanding programs that facilitate consumers' ability to
3 host a renewable energy system to directly self-supply energy needs or sell energy, for
4 example via net metering. As part of this works, IREC been involved across the United
States discussions and proceedings regarding the valuation of distributed generation.

5 The claims and proposals put forth by APS in the Application will have a direct
6 and substantial impact on IREC's work on the costs and benefits of distributed
7 generation, and net metering policies. Currently, as APS notes in its Application, these
8 issues are receiving heightened attention nationally as state policymakers and other
9 stakeholders consider how to facilitate renewable energy going forward.¹ Stakeholders in
other states will be watching this proceeding and consequently it will influence IREC's
ability to work on these issues in other states.

10 For these reasons, IREC will be directly and substantially affected by APS's
11 Application. Only through direct participation in this proceeding can IREC's interests be
12 protected. Therefore, IREC requests that the Commission grant this Application for
13 Leave to Intervene. Granting IREC intervenor status will not unduly broaden the issues
14 nor unreasonably delay the proceeding, except upon leave of the Commission first had
and received. Moreover, in this proceeding IREC is well positioned to provide
information and guidance gained from working on these issues elsewhere in the country.

15 The name, mailing address, and telephone number of the persons upon whom
16 service of all documents is to be made is:

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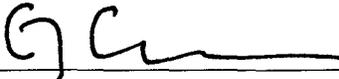
22 For the foregoing reasons, IREC respectfully requests that the Commission grant
23 IREC's Application for Leave to Intervene in this proceeding.

24 Respectfully submitted this 29th of August, 2013.

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26 ¹ See Application at 2.

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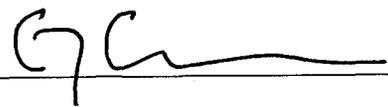
Attorney for Applicant IREC

1 Original and 13 Copies of the foregoing
2 Filed this 29th day of August 2013 with:

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

7 Copies of the foregoing electronically mailed / mailed this 29th day of August 2013 to:

8 ALL PARTIES OF RECORD

9 By  _____
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