

**INTERVENTION**

**ORIGINAL**



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ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission

**DOCKETED**

JAN 17 2014

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

**BOB STUMP**  
CHAIRMAN

**GARY PIERCE**  
COMMISSIONER

**BRENDA BURNS**  
COMMISSIONER

**BOB BURNS**  
COMMISSIONER

**SUSAN BITTER-SMITH**  
COMMISSIONER

**IN THE MATTER OF THE  
COMMISSION'S INQUIRY INTO  
POTENTIAL IMPACTS TO THE  
CURRENT UTILITY MODEL  
RESULTING FROM INNOVATION  
AND TECHNOLOGICAL  
DEVELOPMENTS IN GENERATION  
AND DELIVERY OF ENERGY.**

**DOCKET NO. E-00000J-13-0375**

**APPLICATION OF THE ALLIANCE  
FOR SOLAR CHOICE (TASC) FOR  
LEAVE TO INTERVENE**

17 On November 4, 2013 the Arizona Corporation Commission (the "ACC" or  
18 "Commission") opened the above referenced matter in Docket No. E-00000J-13-0375 (the  
19 "Docket"). The Alliance for Solar Choice ("TASC"), by and through its undersigned counsel  
20 and pursuant to R14-3-105,<sup>1</sup> hereby respectfully requests that the ACC issue an Order granting it  
21 leave to intervene in the Docket. In support of this Motion, TASC states the following:

22 1) TASC advocates for maintaining successful distributed solar energy policies, such  
23 as retail net metering ("NEM"), throughout the United States. Members represent the majority  
24 of the nation's rooftop solar market and include SolarCity, Sungevity, Sunrun, Verengo Solar,  
25 REC Solar, and Solar Universe. These companies are important stakeholders in Arizona's  
26

27 <sup>1</sup> Rule 14-3-105 provides that "persons, other than the original parties to the proceedings, who  
28 are directly and substantially affected by the proceedings, shall secure an order from the  
Commission or presiding officer granting leave to intervene before being allowed to participate."

1 Renewable Energy Standard (“RES”) and NEM programs and are responsible for thousands of  
2 residential, school, church, government and commercial solar installations in the State.  
3 Together, these companies have brought hundreds of jobs and many tens of millions of dollars of  
4 investment to Arizona’s cities and towns;

5 2) Although the precise scope of this proceeding is yet to be determined, the  
6 ostensible purpose of Docket No. E-00000J-13-0375 is to provide the Commission an  
7 opportunity consider the impact of innovative technologies—including solar photovoltaics  
8 (PV)—on the utility business model;<sup>2</sup>

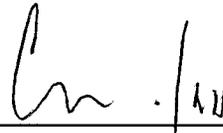
9 3) TASC anticipates that this proceeding will address the underlying policies—  
10 including NEM—that encourage customers to install onsite solar PV and are central to the  
11 businesses of TASC’s members in this state. As such, TASC’s members have a direct and  
12 substantial interest in the Commission’s consideration of this matter. Only through direct  
13 participation in this proceeding can TASC protect its members’ interests; and

14 4) Granting TASC intervenor status will not delay this proceeding, unduly broaden  
15 the issues or prejudice other parties to the Docket, and no other party can adequately represent  
16 TASC’s interests in this matter.

17 Service of all documents or pleadings should be made to TASC counsel at the following  
18 address:

19 Court S. Rich  
20 Rose Law Group pc  
21 6613 N. Scottsdale Road, Suite 200  
22 Scottsdale, Arizona 85250

23 Respectfully submitted this 17th day of January, 2014.

24 

25 \_\_\_\_\_  
26 Court S. Rich  
27 Rose Law Group pc  
28 Attorney for Intervenor TASC

29 <sup>2</sup> See letter from Commissioner Robert L. Burns to Chairman Stump and Commissioners  
30 docketed in this proceeding on November 4, 2013

1 **Original and 13 copies filed on**  
2 **this 17th day of January, 2014 with:**

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

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

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