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BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP,
Chairman
GARY PIERCE,
Commissioner
BRENDA BURNS,
Commissioner
ROBERT L. BURNS,
Commissioner
SUSAN BITTER SMITH,
Commissioner

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ARIZONA CORP COMMISSION
DOCKET CONTROL

ORIGINAL

Arizona Corporation Commission
DOCKETED

FEB 14 2014

DOCKETED BY 

IN THE MATTER OF THE COMMISSION'S)
INVESTIGATION OF THE VALUE AND)
COST OF DISTRIBUTED GENERATION)
(INCLUDING NET METERING))

DOCKET NO. E-00000J-14-0023

Comments of First Solar

First Solar commends the Arizona Corporation Commission ("Commission") for opening a docket to hold workshops to help inform future policy related to the value of Distributed Generation ("DG") installations.

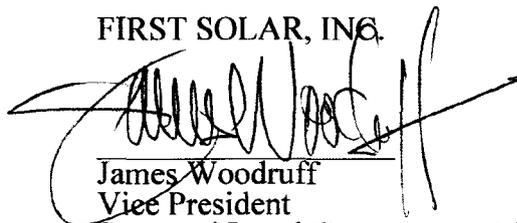
Such workshops can contribute significantly to the Commission's understanding and consideration of the "... net metering cost shift issue, the development of a method(s) by which the value of DG solar can be considered and balanced in the public interest and the evaluation of the role and value of the electric grid as it relates to rooftop solar, other forms of distributed generation, and customer-sited technology generally." Among other things, these workshops can provide a more informed understanding of the costs and benefits of rooftop DG to subscribers (that is, those who choose to own or lease rooftop DG systems), non-subscribers (that is, ratepayers who do not choose to own or lease such systems), and to load serving entities. In considering the issues to be addressed in this docket, First Solar believes that the Commission should strive to achieve the maximum benefits of solar at the lowest cost to all stakeholders.

In order to fully understand the costs and benefits of rooftop DG across these stakeholder groups, it is essential that the workshops consider alternatives to rooftop DG that are capable of achieving the same policy objectives at lower installed system cost. For example, what is the relative cost to the non-subscribing customer of a utility procuring 100 MW of solar energy pursuant to a PPA from a single, grid-connected facility compared to 100 MW of rooftop DG being installed in the utility's service territory with net energy metering? What is the relative cost to the utility? What is the relative cost to those who chose to lease or buy rooftop solar installations?

Accordingly, First Solar recommends that the workshops include a comparison of the costs and benefits of utility scale and community solar facilities with those attributed to rooftop solar installations. All forms of solar provide the benefits associated with rooftop solar, such as carbon reduction and negligible water consumption. But the relative cost of achieving these goals may vary considerably based on the type and scale of the solar installation. First Solar believes that it is in the public interest to consider whether rooftop DG, which is not, after all, an end in itself, is the most cost-effective means of achieving the Commission's overall policy goals in authorizing or mandating the procurement of solar in the first place. This inquiry will provide the Commission with a fuller understanding of the value of DG solar and will allow Commissioners to optimize the deployment of solar systems in Arizona to achieve the maximum benefit at the lowest cost to all stakeholders.

Dated this 14th day of February, 2014

FIRST SOLAR, INC.



James Woodruff
Vice President
State and Local Government Affairs
350 W. Washington Street
Suite 600
Tempe, Arizona 85281
(602) 414-9300

ORIGINAL and thirteen (13) copies of the foregoing filed this 14th day of February, 2014, with:

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand delivered this 14th day of February, 2014, to:

Bob Stump, Chairman
The Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Gary Pierce, Commissioner
The Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Brenda Burns, Commissioner
The Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Robert L. Burns, Commissioner
The Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Susan Bitter Smith, Commissioner
The Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Steve Olea, Director
Utilities Division
The Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007