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BEFORE THE ARIZONA CORPORATION COMMISSION

2014 SEP -3 P 4: 11

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SUSAN BITTER SMITH

ARIZONA COMPETITIVE POWER ALLIANCE
916 WEST ADAMS SUITE 3
PHOENIX, AZ 85007

GREG PATTERSON, DIRECTOR

IN THE MATTER OF THE APPLICATION
OF ARIZONA PUBLIC SERVICE
COMPANY FOR APPROVAL OF ITS 2014
RENEWABLE ENERGY STANDARD
IMPLEMENTATION PLAN FOR RESET OF
RENEWABLE ENERGY ADJUSTOR.

DOCKET NO. E-01345A-13-0140

**SUPPORT OF ALLIANCE FOR SOLAR
CHOICE MOTION TO DISMISS APS
UTILITY DG PROPOSAL**

ORIGINAL

Arizona Corporation Commission
DOCKETED

SEP 3 2014

DOCKETED BY

The Arizona Competitive Power Alliance (AzCPA) through its undersigned counsel expresses support for the Alliance for Solar Choice Motion to Dismiss the APS Utility DG Proposal. The ACC closed APS's 2014 REST Plan over seven months ago, and APS has already filed its 2015 REST Plan. Rather than attempt to re-litigate issues that were previously decided in a long-closed docket, APS should amend its 2015 REST proposal in order to reflect its new-found admiration for rooftop solar generation.

The AzCPA believes that in addition to being procedurally suspect, the APS proposal is wrong on both of its substantive proposals. APS is advocating for utility owned, distributed generation. The Alliance believes that private party construction combined with PPAs provide consumers with renewable power at lower prices with less risk and greater flexibility.

Additionally, the Alliance believes that the economies associated with utility scale renewable

1 generation far outweigh the transmission and distribution savings inherent in distributed
2 generation.

3 Not only does APS's decision to make its proposal in a long-closed docket deprive parties
4 of the opportunity to challenge APS's new views and assumptions regarding the benefits of utility
5 owned rooftop solar, but the choice of docket also directly conflicts with the decisions that the
6 Commission reached in that docket. For these reasons, the AzCPA supports the Solar Alliance'
7 motion to dismiss the APS Utility DG proposal.

8
9 RESPECTFULLY SUBMITTED this 3rd Day of September, 2014

10
11 By: 

12 Greg Patterson
13 916 West Adams Suite 3
14 Phoenix, AZ 85007
Telephone (602) 369-4368

15 ORIGINAL and 13 copies of the
16 foregoing hand-delivered for filing
this 3rd Day of September, 2014

17 Docket Control
18 ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, Arizona 85007

19 Additional Copies Mailed to:

20 C. Webb Crockett
21 Fennemore Craig, P.C
2394 E. Camelback Road, Suite 600
22 Phoenix, Arizona 85016

23 Thomas Loquvam
400 N. 5Th Street, MS 8695
24 Phoenix, Arizona 85004
Mark Holohan

25 AriSEIA
26 2221 W. Lone Cactus Drive, Suite 2
Phoenix, Arizona 85027

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15
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17
18
19
20
21
22
23
24
25
26

Garry Hays
1702 E. Highland Avenue #204
Phoenix, Arizona 85016

Daniel W. Pozefsky, Chief Counsel
RUCO
1110 W. Washington, Ste. 220
Phoenix, AZ 85007

Janice Alward, Chief Counsel
Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007