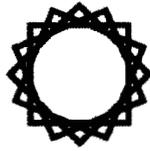




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ASDA
ARIZONA SOLAR DEPLOYMENT ALLIANCE

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October 31, 2014

ORIGINAL

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

Arizona Corporation Commission
DOCKETED

OCT 31 2014

RE: Arizona Public Service Company (APS or Company)
Supplemental Application (Utility- Owned DG)
APS 2014 RES Implementation Plan
Docket No. E-01345A-13-0140
E-01345A-14-0250

DOCKETED BY 

Over the past several months, the Arizona Solar Deployment Alliance (“ASDA”) has watched as a certain party in the docket referenced above engaged in, for lack of a better term, mudslinging. This party (AriSEIA) has made wild, unfounded accusations regarding ASDA and others. AriSEIA’s inflammatory letter and subsequent media interviews contain gross assumptions, factual inaccuracies and wild accusations. AriSEIA and its members/employees constant degradation of the Arizona Corporation Commission (“ACC”) process must be stopped. ASDA did not believe AriSEIA’s letter deserved or warranted a response for fear of giving it legitimacy but based upon subsequent filings in the docket, ASDA felt it necessary to respond. This letter will, hopefully, allow interested parties to have a better understanding of ASDA.

AriSIEA’s letter is based upon a point/counterpoint op-ed regarding the Az Sun program from Don Brandt, CEO of Pinnacle West on one side and Court Rich, an AriSEIA executive board member and lawyer for a SolarCity subsidiary on the other. These op-eds ran in the Arizona Republic on August 31, 2014. ASDA was not aware of these op-eds until we received the letter from AriSEIA. ASDA’s position all along has been to argue our cases in front of the ACC, not editorial boards. That principle will hold true in this instance as well. Since APS’ op-ed and AriSEIA’s letter discussed ASDA, it is important that the record is clear as to what role ASDA played in the Az Sun program.

ASDA Formation

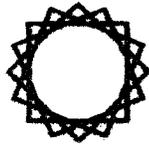
Leading members of the Arizona solar industry formed ASDA because they realized that no one was advocating for good solar policy for Arizonans. The founding members of ASDA realized that the solar organizations had been taken over by national leasing companies that cared less about Arizona and more about the impact of Arizona’s policies in the other states they operated in. Additionally, the



founders of ASDA felt existing solar organizations were spending their time throwing bombs in the media instead of filing cogent reasonably worded briefs and responses at the Commission. With this in mind, ASDA was founded with some simple rules. All ASDA board members must represent a company that is headquartered in Arizona, that company must hold an Arizona Registrar of Contractors license for solar installation and the member cannot serve on the board of any other solar organization. These rules ensure that the Board's perspective is Arizona based and not influenced by outside national companies. The rules also ensure that ASDA will not be tainted by the vitriolic inflammatory actions and tactics taken by other solar organizations, which unfortunately garners headlines and give all solar organizations a bad name. In other words, ASDA and its members are always striving to do what is right for Arizona and not worry about how Arizona policy will impact other states.

AZ Sun Program

The letter from AriSEIA focuses on two words in APS' op-ed, "innovative partnership." ASDA was not privy to the op-ed before it was published and was unaware APS even considered that a partnership existed with ASDA. What did exist between APS and ASDA as it relates to the AZ Sun program was a consultation of ASDA members on their thoughts and ideas on the program. In no way shape or form does ASDA have any type of formal or informal agreement with APS as it relates to the AZ Sun program. ASDA does not have any type of agreement with APS on any issue. There is no financial arrangement between APS and ASDA or its members or representatives. ASDA has not received anything from APS. There have been no promises made about the RFI/RFP process. APS has not compensated ASDA, its members or its representatives in any way in regards to the AZ Sun Program. ASDA does not consider itself to have a partnership with APS. In fact, a quick perusal of the dockets that ASDA has intervened in will show that ASDA consistently takes positions that are in opposition to APS. Admittedly, the positions that ASDA takes are usually more pragmatic and well reasoned when compared to stances of other solar organizations but ultimately ASDA's positions are counter to APS as well as other electric companies in the state. ASDA's involvement in the Az Sun program came about because of its mission to support good solar policy in Arizona. ASDA believes that the AZ Sun program is good for Arizonans. APS sought out ASDA and its members for several reasons. ASDA members are the leading solar contractors in Arizona. Additionally, ASDA members participated in the APS schools and government programs. ASDA members provided input into the Flagstaff pilot project as well. Finally, the main reason APS asked ASDA members thoughts and ideas regarding the program is simply because they are the true leaders of the Arizona solar industry.



ASDA
ARIZONA SOLAR DEPLOYMENT ALLIANCE

ASDA Members

ASDA board members are the true leaders of the local solar industry. Board members have a long history in this industry and have held various leadership roles in other organizations and served on numerous boards and panels throughout the state. ASDA members have installed over ten thousand solar systems in Arizona. The companies employ hundreds of Arizonans and have so for over a decade. These are family owned businesses that understand the Arizona solar landscape. The board members of ASDA are the people doing the real work.

AriSEIA

ASDA members are puzzled by the attacks levied by AriSEIA. The implications both in the letter and in media reports are inappropriate and irresponsible. There seems to be concern on AriSEIA's part that ASDA has received payment from APS. As detailed above, ASDA has not received anything from APS. AriSEIA, on the other hand, cannot make that same avowal. APS is a member of AriSEIA and in that capacity has donated significant money to AriSEIA in the recent past. The most troubling aspect of this is AriSEIA's blatant and ham-handed attempt to discredit ASDA and make AriSEIA look like they are the ones speaking for the solar industry. People who throw out uninformed baseless allegations is not what the industry needs as spokesmen. ASDA looks forward to having productive discussion with the ACC and its staff in open meeting not in the newspapers.

Sean Seitz
President ASDA

ORIGINAL and thirteen (13)
Copies filed on October 31, 2014 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Copies of the foregoing
Mailed/hand delivered on October 31, 2014 to:

Lyn A. Farmer, Esq.
Chief Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Janice Alward, Esq.
Chief Council, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Steve Olea
Director, Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

Thomas Loquvam
400 N. 5th Street, MS 8695
Phoenix, AZ 85004

C. Webb Crockett
Fennemore Craig, PC
2394 E. Camelback Road, Suite 600
Phoenix, AZ 85016

Mark Holohan
Arizona Solar Industries Association
2221 West Lone Cactus Drive, Suite 2
Phoenix, AZ 85027

Daniel Pozefsky
1110 West Washington, Suite 200
Phoenix, AZ 85007

Coash & Coash
1802 N. 7th Street
Phoenix, AZ 85006

Gregory Bernosky
Lisa Malagon- APS
Mail Station 9712 P.O. Box 53999
Phoenix, AZ 85072

Bradley Carroll
88 E. Broadway Blvd. MS HQE910
P.O. Box 711
Tucson, AZ 85701

Michael Patten
Roshka DeWulf & Patten, PLC
One Arizona Center
400 E. Van Buren Street, Suite 800
Phoenix, AZ 85004

Court Rich
7144 E. Stetson Drive, Suite 300
Scottsdale, AZ 85251