

ORIGINAL

INTERVENTION



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Arizona Corporation Commission
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BEFORE THE ARIZONA CORPORATION COMMISSION

SUSAN BITTER SMITH
CHAIRMAN

BOB STUMP
COMMISSIONER

BOB BURNS
COMMISSIONER

TOM FORESE
COMMISSIONER

DOUG LITTLE
COMMISSIONER

11 **IN THE MATTER OF THE**) **DOCKET NO. E-01933A-15-0239**
12 **APPLICATION OF TUCSON**)
13 **ELECTRIC POWER COMPANY**)
14 **FOR APPROVAL OF ITS 2016**)
15 **RENEWABLE ENERGY STANDARD**) **THE ENERGY FREEDOM COALITION**
16 **AND TARIFF IMPLEMENTATION**) **OF AMERICA'S APPLICATION FOR**
17 **PLAN.**) **LEAVE TO INTERVENE**

17 Pursuant to A.A.C. R14-3-105, the Energy Freedom Coalition of America ("EFCA")
18 hereby makes its Application for Leave to Intervene (the "Application") in the above captioned
19 proceedings (the "Proceeding").

20 EFCA is a solar energy advocacy association. EFCA's membership is made up of solar
21 companies including, Silevo, SolarCity, and ZEP Solar. These companies are important
22 stakeholders in Arizona's rooftop solar industry. EFCA's members are responsible for thousands
23 of residential, school, church, government and commercial solar installations in the
24 Arizona. Together, EFCA's members have brought hundreds of jobs and many tens of millions
25 of dollars of investment to Arizona's cities and towns.

26 EFCA is entitled to intervene because EFCA and its members are directly and substantially
27 affected by the Proceeding and EFCA's intervention will not unduly broaden the issues
28 presented. In support of this Application, EFCA submits the following information.

1 **I. EFCA is Directly and Substantially Affected**

2 In the Proceedings, Tucson Electric Power (“TEP”) proposes to, among other things,
3 expand its utility owned distributed generation program and implement new programs through its
4 regulated entity to compete directly with EFCA member companies in providing rooftop solar to
5 Arizona residents. These proposals substantially impact EFCA.

6
7 **II. EFCA’s Intervention can Assist the Commission**

8 EFCA is uniquely well positioned to offer insight to assist the Commission in its evaluation
9 of the issues in the Proceedings.

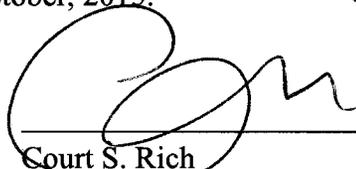
10
11 **III. EFCA’s Intervention Will Not Broaden These Proceedings**

12 Granting EFCA intervenor status will not unduly broaden the issues or prejudice other
13 parties to the Docket.

14
15 Service of all documents or pleadings should be made to EFCA counsel at the following
16 address:

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18 Rose Law Group pc
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20 Scottsdale, Arizona 85251

21 Respectfully submitted this 22nd day of October, 2015.

22
23 
24 _____
25 Court S. Rich
26 Rose Law Group pc
27 Attorney for Intervenor EFCA
28

1 **Original and 13 copies filed on**
2 **this Wed day of October, 2015 with:**

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

7 Copy of the foregoing sent by electronic and regular mail to:

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By: 