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TO: Docket Control

FROM: Briana Kobor
Program Director, DG Regulatory Policy
Vote Solar

DATE: July 12, 2016

RE: In the Matter of Resource Planning and Procurement in 2015 & 2016. Docket No. E-00000V-15-0094

SUBJECT: Comments regarding workshop

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Vote Solar appreciates the opportunity to provide comments regarding the agenda for the workshop that the Arizona Corporation Commission will hold on the Arizona utilities' Preliminary Integrated Resource Plans (IRPs). Vote Solar strongly supports focusing the discussion on the eight topics identified by Staff in their June 10, 2016 memorandum. Vote Solar suggests the following elaboration for selected topics.

- 1) **Role of Energy Efficiency and Demand Response.** Each utility should identify the assumptions behind the forecasts of customer adoption of Energy Efficiency and Demand Response measures.
- 2) **Consideration of new technologies.** Suites of aggregated distributed energy resources (DERs) should be considered as alternatives to generation, transmission and distribution investments. Aggregated DERs may include some or all of the following: energy storage, energy efficiency, demand response, distributed generation, vehicle-to-grid, other technologies. Utilities should also identify plans for leveraging capabilities of DERs in deferring or avoiding transmission and distribution investments and improving reliability.
- 3) **Methodologies used to consider Distributed Generation (DG) penetration.** Each utility should identify the assumptions behind the forecast of customer adoption of DG. The impact of proposed utility rate design proposals on DG penetration should be discussed in the IRPs. Third-party community solar programs should be considered alongside proposals such as APS's proposed Saguaro plant.
- 4) **Forecasting techniques, Scenario and Sensitivity Analyses.** The following scenarios should be included in the IRPs:
 - a) Adoption of a mass-based compliance approach to the Clean Power Plan
 - b) Adoption of a rate-based compliance approach to the Clean Power Plan
 - c) Early retirement of aging coal power plants
 - d) High levels of customer-driven DER penetration

- e) High levels of Energy Efficiency and Demand Response
 - f) High level of adoption of Electric Vehicles
 - g) Participation in EIM (TEP and UNSE) and full participation in regional ISO day ahead and real time energy markets (all utilities)
 - h) Limitations on water use at thermal power plants due to climate stress
- 5) **Three-year action plans.** Three-year action plans should include capital plans for upgrades to the transmission and distribution systems in addition to new sources of generation.
- 6) **Process and timing of filing preliminary plans.** The process for reviewing the utility IRPs should provide for several opportunities for stakeholders to review both Commission guidelines and each utility's proposed plans.

Vote Solar looks forward to a productive discussion on July 18th.

Sincerely,



Briana Kobor
Program Director, DG Regulatory Policy
Vote Solar