

ORIGINAL

INTERVENTION



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Arizona Corporation Commission  
**DOCKETED**  
 OCT 19 2016

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

DOUG LITTLE  
CHAIRMAN

BOB STUMP  
COMMISSIONER

BOB BURNS  
COMMISSIONER

TOM FORESE  
COMMISSIONER

ANDY TOBIN  
COMMISSIONER

12 **IN THE MATTER OF THE** ) **DOCKET NO. E-01933A-16-0235**  
 13 **APPLICATION OF TUCSON** )  
 14 **ELECTRIC POWER COMPANY** )  
 15 **FOR APPROVAL OF ITS 2017** ) **THE ENERGY FREEDOM COALITION**  
 16 **RENEWABLE ENERGY STANDARD** ) **OF AMERICA'S APPLICATION FOR**  
 17 **IMPLEMENTATION PLAN** ) **LEAVE TO INTERVENE**

18 Pursuant to A.A.C. R14-3-105, the Energy Freedom Coalition of America, LLC, a  
 19 Delaware limited liability company<sup>1</sup> ("EFCA") registered to do business in the State of Arizona,  
 20 hereby makes its Application for Leave to Intervene (the "Application") in the above captioned  
 21 matter (the "Matter").

22 EFCA represents businesses that develop, provide, and research customers' adoption of  
 23 residential and commercial distributed energy resources ("DERs") including, but not limited to,  
 24 distributed generation solar ("DG Solar"). EFCA promotes its members' interests in providing  
 25 these products by participating in a variety of jurisdictions, including in public utility  
 26 commission proceedings across the nation and in the courts; and in keeping with its mission, has

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 28 <sup>1</sup> As of the date of this filing, its members include Silevo, Inc., SolarCity Corporation, ZEP Solar, LLC, 1 Sun Solar Electric, LLC, Go Solar, LLC, and Ecological Energy Systems.

1 intervened in several dockets at the Arizona Corporation Commission to date.<sup>2</sup> In support of this  
2 Application, EFCA states as follows:

3 EFCA is entitled to intervene because the REST Implementation Plans directly and  
4 substantially affect EFCA's interest in the adoption of DERs and EFCA's intervention will not  
5 unduly broaden the issues presented. In support of this Application, EFCA submits the  
6 following information.

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

8 EFCA is entitled to intervene because the proposals at issue in the Matter and in the  
9 REST Implementation Plan process directly and substantially impact residential and commercial  
10 DERs and therefore, electricity consumers' demand for such products. EFCA seeks intervention  
11 in this docket so as to ensure that the adoption of DERs by residential and commercial utility  
12 customers is not impeded as a result of the resolution of the Matter. As such, EFCA will be  
13 directly and substantially affected by the Matter.

14 **II. EFCA's Intervention can Assist the Commission**

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

17 **III. EFCA's Intervention Will Not Broaden These Proceedings**

18 Granting EFCA intervenor status will not unduly broaden the issues or prejudice other  
19 parties to the Docket. EFCA is not and cannot be adequately represented by any other party. In  
20 order for DER developers to provide these valuable products and services, electricity customers  
21 must be presented with appropriate tariffs and other price signals that will lead them to want to  
22 choose to avail themselves of DER. As a result, the value of DER providers' products and  
23 services is uniquely dependent on the signals sent by rates on the customer's usage of energy and  
24 the distribution system, giving EFCA a direct interest in ensuring that the outcomes of this  
25 proceeding continue to support customers' DER adoption.

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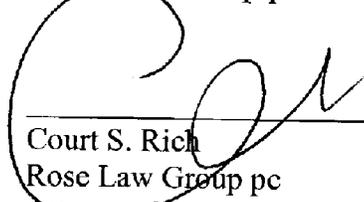
26  
27  
28 <sup>2</sup> See Tucson Electric Power's 2016 Renewable Energy Standard and Tariff Implementation Plan, Docket No. E-01933A-15-0239; Tucson Electric Power Rate Case, Docket No. E-01933A-15-0322; Sulphur Springs Valley Electric Cooperative Rate Case, Docket No. E-01575A-15-0312; Trico Electric Cooperative Rate Case, Docket No. E-01461A-15-0363; Arizona Public Service Company Rate Case, Docket No. E-01345A-16-0036

1 Service of all documents or pleadings should be made to EFCA counsel at the following  
2 address:

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8 HSlaughter@roselawgroup.com

9  
10 Respectfully submitted this 19<sup>th</sup> day of October, 2016.

11 ~~Rose Law Group pc~~

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13 \_\_\_\_\_  
14 Court S. Rich  
15 Rose Law Group pc  
16 Attorney for Intervenor EFCA

1 **Original and 13 copies filed on**  
2 **this 19<sup>th</sup> day of October, 2016 with:**

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

7 *I hereby certify that I have this day served a copy of the foregoing document on all parties of*  
8 *record in this proceeding by regular or electronic mail to:*

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By: 