Vote Solar is a non-profit grassroots organization working to foster economic opportunity and promote environmental benefits by bringing solar energy into the mainstream. Since 2002, Vote Solar has engaged at the state, local and federal levels of government to remove regulatory barriers and implement policies needed to bring solar to scale. Vote Solar has engaged in formal proceedings related to solar generation in Arizona, Arkansas, California, Colorado, Connecticut, District of Columbia, Florida, Georgia, Idaho, Illinois, Kansas, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Nevada, New Hampshire, New Mexico, New York, North Carolina, Rhode Island, South Carolina, Utah, Vermont, and Wisconsin. Vote Solar is not a trade group and is not affiliated with the solar industry.

Vote Solar appreciates this opportunity to comment. Vote Solar supports the Joint Stakeholder Comments on the Integrated Resource Plans of Arizona Public Service Company ("APS") and Tucson Electric Power ("TEP") that were filed with this Commission on February 2, 2018. The Joint Stakeholder Comments propose Alternative Portfolios to the Selected Portfolios offered by APS and TEP that would (1) benefit Arizona ratepayers; (2) promote the expansion of renewable energy, energy storage, and demand side management; and (3) avoid the risk of significant investment in potentially obsolete forms of conventional generation.
By developing a more diverse and innovative portfolio for APS and TEP, as well as correcting
for several unreasonable assumptions in the utility plans, the Joint Stakeholders have put forth
a robust vision of Arizona’s energy future that is estimated to save ratepayers over half a
billion dollars. Namely, APS customers are expected to save $275 million and TEP customers
are expected to save $268 million. These savings come from the replacement of costly new
natural gas facilities and associated fuel costs with a low-cost portfolio of clean energy resources
that leverage new and existing technology to meet the many challenges associated with operating
Arizona’s electric grid.

One of the prominent features of the Alternative Portfolios is the addition of cost-effective
renewable energy resources. In APS’s Selected Portfolio the utility proposed no substantive
additions of utility-scale renewable energy over the course of the planning period. In contrast, the
Alternative Portfolio for APS provides an additional 1,105 MW of new wind, 1,920 MW of new
solar photovoltaic, and 30 MW of forest biomass. TEP’s Selected Portfolio fared slightly better
on the renewables front given TEP’s commitment to 30% renewables by 2030. The Alternative
Portfolio accelerates the deployment of TEP’s proposed renewable resource additions and adds
an additional 200 MW of wind and 150 MW of solar after 2023. The Alternative Portfolios
result in 40% renewable energy in Arizona by 2030. While Vote Solar believes that an even
larger renewable portfolio is in the public interest, we strongly support the Alternative Portfolio
for moving Arizona in the right direction.

While the utilities’ Selected Portfolios each include significant natural gas expansion, under the
Alternative Portfolios we see that it is unnecessary to commit Arizona ratepayers to these large,
costly investments. Interestingly, APS appears to have done little analysis of alternatives to their
proposed gas expansion, including nearly identical additions of natural gas combined cycle units
in each of the seven portfolios they analyzed. In contrast, the Joint Stakeholders have proposed a
robust portfolio that would decrease the utilities’ proposals for 2,400 MW of new natural gas
additions over the next five years to just the 510 MW that has already been committed for the
Ocotillo project. These large, lumpy investments are replaced with an innovative and diverse
portfolio of not only renewables, but also significant expansion of new energy storage, energy
efficiency, demand response, and demand management. The Alternative Portfolios would avoid
the financial and environmental liabilities associated with new natural gas generation. These liabilities include risks associated with uncertain fuel cost; commitment to conventional generation and its associated emissions of greenhouse gases and other pollutants; and increased use of Arizona’s precious water resources.

Vote Solar urges the Commission to give the Joint Stakeholders’ comments due consideration. The Alternative Portfolios proposed are the result of detailed analysis that demonstrates that Arizona can build a cleaner, more diverse energy system while avoiding significant investment in potentially obsolete conventional generation all while saving Arizona ratepayers over half a billion dollars in the next fifteen years. We thank the Commission and its staff for the opportunity to submit these comments.

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