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2018 FEB -5 P 12: 51

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COMMISSIONERS

- Tom Forese – Chairman
- Bob Burns
- Andy Tobin
- Boyd Dunn
- Justin Olson

Docket No. E-00000V-15-0094

IN THE MATTER OF RESOURCE
PLANNING AND PROCUREMENT
IN 2015 AND 2016

VOTE SOLAR COMMENTS IN
SUPPORT OF THE JOINT
STAKEHOLDERS'
ALTERNATIVE PORTFOLIOS

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

10 Vote Solar appreciates this opportunity to comment. Vote Solar supports the Joint Stakeholder
 11 Comments on the Integrated Resource Plans of Arizona Public Service Company (“APS”) and
 12 Tucson Electric Power (“TEP”) that were filed with this Commission on February 2, 2018. The
 13 Joint Stakeholder Comments propose Alternative Portfolios to the Selected Portfolios offered by
 14 APS and TEP that would (1) benefit Arizona ratepayers; (2) promote the expansion of renewable
 15 energy, energy storage, and demand side management; and (3) avoid the risk of significant
 16 investment in potentially obsolete forms of conventional generation.

1 By developing a more diverse and innovative portfolio for APS and TEP, as well as correcting
2 for several unreasonable assumptions in the utility plans, the Joint Stakeholders have put forth
3 a robust vision of Arizona's energy future that is **estimated to save ratepayers over half a**
4 **billion dollars**. Namely, APS customers are expected to save \$275 million and TEP customers
5 are expected to save \$268 million. These savings come from the replacement of costly new
6 natural gas facilities and associated fuel costs with a low-cost portfolio of clean energy resources
7 that leverage new and existing technology to meet the many challenges associated with operating
8 Arizona's electric grid.

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

20 While the utilities' Selected Portfolios each include significant natural gas expansion, under the
21 Alternative Portfolios we see that it is unnecessary to commit Arizona ratepayers to these large,
22 costly investments. Interestingly, APS appears to have done little analysis of alternatives to their
23 proposed gas expansion, including nearly identical additions of natural gas combined cycle units
24 in each of the seven portfolios they analyzed. In contrast, the Joint Stakeholders have proposed a
25 robust portfolio that would decrease the utilities' proposals for 2,400 MW of new natural gas
26 additions over the next five years to just the 510 MW that has already been committed for the
27 Ocotillo project. These large, lumpy investments are replaced with an innovative and diverse
28 portfolio of not only renewables, but also significant expansion of new energy storage, energy
29 efficiency, demand response, and demand management. The Alternative Portfolios would avoid

1 the financial and environmental liabilities associated with new natural gas generation. These
2 liabilities include risks associated with uncertain fuel cost; commitment to conventional
3 generation and its associated emissions of greenhouse gases and other pollutants; and increased
4 use of Arizona's precious water resources.

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

Dated: February 5, 2018



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