Dear sirs:

APS's argument that they need to build additional infrastructure to meet the needs of providing power to solar homes at night and on cloudy days is not valid and is over dramatized. Reasoning.

The only hours solar homes would need APS services is at night and cloudy days. These are hours that are off peak to start with, meaning solar homes would only be using excess capacity already present in APS's current capacity, not create any need to expand it's capacity. Arizona's greatest challenge is to produce more power for on peak demand. With solar, the consumer supplies his own on-peak power during that period, reducing the required investment by APS to meet peak hour need. The public and APS win by not having to build that capacity, even as Arizona grows.

APS needs only to determine their off peak needs and maintain only that production capacity, which is unquestionably far less than building capacity to generate all on peak need through a centralized system. Remove on peak demand and use more off peak demand, which solar achieves, and your total required capacity will fall; there is no possible way it won't.

Solar homes are also more environmentally suitable means of supplying the energy for the State of Arizona. In fact, if all homes in Arizona were solar powered, the amount of polluting power generated would fall. It would put our whole state grid in a position where only off peak capacity would need to be produced, reducing significantly the overall investment in public energy production.

Moving from a technology which produces electricity at a high environmental cost, for one that is far less
environmentally costly and less economically challenging. The more solar home units we have in Arizona the lower the need for larger centralized systems, no matter how you slice it.

The APS proposal is a monopoly doing what it does best, control all energy production in Arizona, even if they are not the one's supplying it. They would not have to buy power from out-state sources. Solar must be protected for Arizona's future.

APS wants to reduce the economic incentive for the public to invest in solar, especially by stopping the ability to pass on solar benefits to new owners, now that's monopoly power even when monopoly power is not in the best interest to the state. What they want with this proposed increase is false, and getting permission to monopolize what they already see as competition is not in the public interest. See not only that APS is wrong in their assessment, but also wish to ensure their gain from it by passing on penalties for investing and using an alternative fuel. What is bad for solar in Arizona is bad for the public interest. We do not need more APS assets, we need to reduce the demand for those assets to every extent possible.

Wade Chio
*End of Complaint*

Utilities' Response:

Investigator's Comments and Disposition:
9/6/13: Entered for the record and docketed
CLOSED
*End of Comments*

Date Completed: 9/6/2013

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