

**To:** Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

**Date:** August 12, 2005

**Re:** Distributed Generation Workshop: Interconnection Issues  
Docket No. E-0000A-99-0431

Dear Sir/Madam:

Cummins appreciates the opportunity to submit comments regarding the draft interconnection rule currently being studied by the Commission workshop.

As a supplier of electric power systems, we are very much in favor of a standard interconnect rule. Such a standard is necessary in order to provide reliable and inexpensive electricity to commercial users.

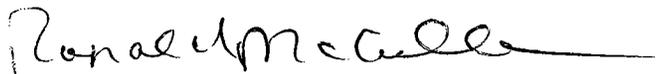
Without a standard interconnection rule, the consumers in our state will be left without alternative choices. It is our opinion that the current utility infrastructure is aged and will need assistance in the coming years.

Part of the overall strategy for meeting consumer demand for electricity will certainly involve distributed generation. With distributed generation, Cummins can quickly add capacity to a burdened electrical grid and deliver clean, high quality inexpensive electricity to consumers in commercial or industrial industry. The costs of distributed generation will be assumed by private companies. And, the environmental impact that comes with overhead transmission lines can be alleviated by putting energy production at the load.

The benefits of distributed generation are numerous and obvious. However, there needs to be a standard that will serve the needs of consumers as well as the utility companies.

We have read the DEAA offer and sized up to the existing utility option, Cummins endorses the Interconnection Rule as submitted by the DEAA.

Sincerely,



Ronald McCulla  
Cummins Rocky Mountain  
General Manager Power Generation

Original + 13 copies of the foregoing filed Docket Control on August 12, 2005

cc: Erin Anderson  
Lori Miller

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