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July 29, 2005

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

RE: Distributed Generation Workshop
Docket No. E-00000A-99-0431

Dear Sir/Madam:

Attached please find Arizona Public Service Company's ("APS") comments submitted in the above matter.

In responding to Staff's assignment within the timeframe provided, APS has chosen to incorporate the technical interconnection requirements contained in the Arizona Draft Interconnection Requirements for Distributed Generation (submitted 11/30/99) as well as sections of APS' current Interconnection Requirements for Distributed Generation, which requirements APS believes should be used to develop the statewide interconnection requirements in the current ACC Working Group process. APS supports many of the provisions included in the Texas Procedures Manual and the Small Generator Interconnection Procedures (SGIP) and Interconnection Agreements (SGIA) adopted by the Federal Energy Regulatory Commission (FERC).

APS is currently working on the development of a statewide interconnection requirements "strawman" that incorporates many of the provisions from the above-mentioned documents and is consistent with the FERC SGIP and SGIA. APS plans to distribute a draft version of this document prior to the next scheduled Working group meeting on August 26, 2005.

If you have any questions, please give me a call at 602-250-3933.

Sincerely,

David Rumolo, Manager
Regulation & Pricing

DR/vld

Cc: Docket Control (Original, plus 13 copies)
Erinn Andreasen
Lori Miller