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June 26, 2025

Arizona Corporation Commission
Vice Chair Nick Myers
1200 W. Washington Street
Phoenix, Arizona 85007

**Re: In the matter of the Generic investigation into cyber threats to critical
infrastructure and data.
(ACC-00000A-20-0008)**

Vice Chair Myers,

In your May 30, 2025, letter in the above docket, you requested information from Load Serving Entities and Electric Cooperatives involving Chinese-manufactured solar inverters and potential cybersecurity vulnerabilities.

Navopache Electric Cooperative ("NEC") owns and operates five small solar installations which are connected to NEC's electric distribution system. The total connected capacity of these five small solar systems is less than 1 MW. The inverters for these solar installations do not have any Chinese-manufactured inverters. The inverters located at these solar installations were manufactured in the following countries: Germany, Italy, and Austria.

Additionally, these inverters do not have communications capability and cannot connect to the internet physically or wirelessly. Since the total connected capacity of these solar installations is less than 1 MW, there would not be any reliability concerns in the event they are tripped off the electric distribution system.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles R. Moore", is written over a horizontal line.

Charles R. Moore
President and Chief Executive Officer
Navopache Electric Cooperative, Inc.