



Consumer Federation of America

1620 I Street, N.W., Suite 200 * Washington, DC 20006

May 17, 2019

Chairman Bob Burns
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, Arizona
85007

Re: RU-00000A-18-0284: Support for Arizona's Energy Efficiency Resource Standard

Dear Chairman Burns and Arizona Corporation Commissioners,

The Consumer Federation of America (CFA) appreciates the opportunity to provide comments on Arizona's Energy Efficiency Resource Standard (EERS) which the Arizona Corporation Commission (ACC) will be considering in the near future.

By way of background, established in 1968, CFA is an association of more than 250 non-profit organizations, including members in Arizona, that works to advance the consumer interest through research, advocacy, and education. CFA has engaged in energy-related issues for over 20 years on both the federal and state levels -- collaborating with state-based consumer organizations. CFA has long supported cost-effective energy and water efficiency appliance standards because of the tremendous consumer benefits they provide.¹ These standards strengthen the minimum energy- and water-saving requirements of home appliances and electronics in order to save consumers money and energy on their utility bills; save water; reduce air pollution from electricity generation; mitigate the risk of electric shortages and blackouts; and drive down utility costs by avoiding the need for costly and unnecessary electric grid investments.

Utility energy efficiency programs play an important role in helping to spur the adoption of these cost-saving standards. They help drive the leading edge of technologies and make efficient products more widely available and accessible, especially among those residential and business consumers who are "hardest to reach." Thus, state policies like Arizona's Energy Efficiency Resource Standard, which ensures the availability of utility energy efficiency programs, are a critical component for realizing the \$2.4 trillion in utility bill savings that will be

¹ <https://consumerfed.org/issues/energy/>

saved nationally thanks to the implementation of appliance standards through 2035.² For Arizona alone, the net present value of these savings is \$50.2 billion.³

Arizona's Energy Efficiency Resource Standard is a win-win-win for Arizona. It cuts energy and water waste, saves consumers and businesses money, and reduces air pollution. For these reasons, we urge the Commission to extend and expand Arizona's Energy Efficiency Resource Standard. As you consider next steps with modifications to the Commission's energy rules, CFA urges you to take into account the significant consumer benefits that efficiency provides.

Thank you for your attention.

Sincerely,



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Director of Energy Programs
Consumer Federation of America
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² Energy-Saving States of America: How Every State Benefits from National Appliance Standards Andrew deLaski and Joanna Mauer, February 2017, <http://appliance-standards.org/sites/default/files/Appliances%20standards%20white%20paper%202%2014-17.pdf>

³ Ibid.