



Arizona Corporation Commission  
 1200 W. Washington St.  
 Phoenix, AZ 85007

May 22<sup>nd</sup>, 2020

RE: DOCKET NUMBER E-01345A-19-0088,  
 Arizona Public Service 2020 Demand Side Management Implementation Plan

Dear Chairman Burns and Arizona Corporation Commissioners,

The following comments by American Council for an Energy-Efficient Economy, Arizona Interfaith Power and Light, CHISPA Arizona, Consumer Federation of America, Foundation For Senior Living, Ideal Energy, Sierra Club, Solar United Neighbors, Southwest Energy Efficiency Project, Tó Nizhóní Ání, Western Grid Group, Western Resource Advocates, and Wildfire wish to express support for Arizona Public Service’s (APS) amended 2020 Demand Side Management (DSM) plan and appreciate the opportunity to state our reasons. **The organizations that have jointly signed this letter strongly support the approval of APS’s energy efficiency programs and urge the Commission to approve this plan at the June 2020 Open Meeting so that customers will gain access to programs that provide long-term economic recovery and relief.**

Energy efficiency has the ability to not only reduce overall energy demand, thereby avoiding the need for additional power plants, but it can also reduce customers’ electric bills at a time when they need it most. The negative impacts of COVID-19 will continue to create an undue hardship

for Arizona's families. Since May 4th, the total of Arizonans that have applied for jobless benefits has totaled nearly 514,000 in the past seven weeks, which is about 7% of the state's population.<sup>1</sup> One of the best tools in the utility toolbox to address this hardship is to save money for ratepayers, strengthen opportunities for local jobs in Arizona, improve indoor air quality in buildings, and reduce energy waste and water consumption.

Arizona's ratepayers have received the following economic benefits due to its energy efficiency programs:

1. From 2010-2017, every \$1 of ratepayer money invested in energy efficiency in Arizona returned ~\$3.92 in benefits to ratepayers.<sup>2</sup>
2. Energy efficiency has created more than 43,000<sup>3</sup> local, family-waged jobs across our state that cannot be outsourced, including more than 28,000 jobs in the Phoenix area alone.<sup>4</sup>

**It is no coincidence that when APS invests in energy efficiency, both the ratepayers and the economy benefits.**

The signers of this letter believe it is more important than ever to offer opportunities for customers to control their electricity costs. While we have not agreed with APS's drastic cuts to energy efficiency programs in recent years, we believe APS's amended 2020 DSM plan is a significant step in the right direction, and the Commission should not delay approval any further.

We respectfully submit these comments on May 22<sup>nd</sup>, 2020,

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<sup>1</sup><https://www.azcentral.com/story/money/business/consumers/2020/05/04/coronavirus-arizona-unemployment-claims-increase-new-applications-decrease/3081956001/>

<sup>2</sup> 2010-2017 Annual Demand Side Management reports of Tucson Electric Power and Arizona Public Service Company filed with the Arizona Corporation Commission.

<sup>3</sup> U.S Energy And Employment Report, 2019,

<https://static1.squarespace.com/static/5a98cf80ec4eb7c5cd928c61/t/5c7f4047652dea9fd7d3c312/1551843400067/Arizona.pdf>

<sup>4</sup> Environmental Entrepreneurs, Energy Efficiency Jobs in America: Arizona: <https://www.e2.org/wp-content/uploads/2018/09/ARIZONA-Dist.pdf>

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