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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS
KRISTIN K. MAYES - CHAIRMAN
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

2009 APR - 9 P 2: 05
AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

APR - 9 2009

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF) DOCKET NO. E-04204A-08-0341
UNS ELECTRIC, INC. FOR APPROVAL OF ITS)
DEMAND-SIDE MANAGEMENT COMPACT)
FLUORESCENT LAMP BUY-DOWN PROGRAM)

**REQUEST FOR ADDITIONAL
FUNDING FOR CFL BUY-DOWN
PROGRAM**

UNS Electric, Inc. ("UNS Electric" or "Company"), through undersigned counsel, hereby respectfully requests the Arizona Corporation Commission ("Commission") to approve an increase in funding for UNS Electric's Demand-Side Management ("DSM") Compact Fluorescent Lamp ("CFL") Buy-down Program ("CFL Buydown Program" or "Program"). Additionally, UNS Electric respectfully requests the Commission to approve recovery of all costs of associated with the Program through the DSM Surcharge that will be effective June 1, 2009. Attached, as Exhibit 1, is UNS Electric's "Request for Additional Funding" for the Program.

In Decision No. 70556 (October 23, 2008), the Commission approved UNS Electric's CFL Buydown Program. The approved Program design incorporated costs and savings estimates for 2008 through 2012., The Program was implemented in December 2008. Although UNS Electric was unable to achieve the total 2008 Program savings or to be able to determine the success of the Program given the timing of the implementation, UNS Electric believes that the demand for CFLs under the program will significantly exceed the demand anticipated by the presently-approved Program. UNS Electric's affiliate, Tucson Electric Power Company ("TEP"), had overwhelming success during the first six months after implementation (July 2008 - December 2008) of an identical CFL Buydown Program, achieving 129.5% of the total estimated annual CFL sales in only a six-month period. Moreover, preliminary CFL sales results for January and February 2009

1 suggest that demand for CFL lamps remains robust. UNS Electric's preliminary numbers from
2 January and February 2009 indicate similar results.

3 Based on TEP's and UNS Electric's experiences, UNS Electric is proposing an increase to
4 the annual budget for the UNS Electric Program. In support of this proposal, UNS Electric is
5 providing a new analysis for 2009 through 2013. The proposed budget and Program benefit are
6 outlined in Exhibit 1 and are compared to the original budget and benefit approved in Decision
7 No. 70556.

8 The incremental increase in the DSM Surcharge to recover the increased CFL Program cost
9 will be \$0.0001 in 2009, as shown below.

Budget Amount	Projected kWh Sales (2009)	DSM Adjustor (incremental)
\$148,611	1,817,013,000	\$0.0001

14
15 UNS Electric anticipates lamp sales to increase from 82,802 lamps (the approved 2009 budget
16 maximum) to 200,255 lamps with the increased funding allowance. The weighted average Total
17 Resource Cost Test ("TRC") for the Program, with increased funding, will increase from 1.92 to
18 4.91.

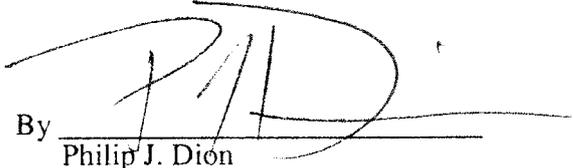
19 WHEREFORE, for all the foregoing reasons, UNS Electric respectfully requests that the
20 Commission authorize UNS Electric to 1) increase funding for the Program based on the new 5-
21 year analysis for 2009 through 2013 as set forth in Exhibit 1 and 2) recover all costs associated
22 with the Program through the DSM Surcharge that will be effective June 1, 2009.

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RESPECTFULLY SUBMITTED this 9th day of April 2009.

UNS Electric, Inc.



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Original and 13 copies of the foregoing
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Exhibit 1

UNS Electric, Inc.'s

Request for Additional Funding

for its

**Demand-Side Management Compact
Fluorescent Lamp Buy-down Program**

UNS Electric, Inc.
Compact Fluorescent Lamp Buy-Down Program

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UNS Electric, Inc.
Compact Fluorescent Lamp Buy-Down Program

I. Introduction

In Decision No. 70556 (October 23, 2008), the Arizona Corporation Commission (“Commission”) approved UNS Electric, Inc.’s (“UNS Electric” or “Company”) Demand-Side Management (“DSM”) Compact Fluorescent Lamp (“CFL”) Buy-down Program (“CFL Buydown Program” or “Program”). The approved Program design incorporated costs and savings estimates for 2008 through 2012. The Program was implemented in December 2008. Although UNS Electric was unable to determine the success of the Program given the timing of the implementation, UNS Electric believes that the demand for CFLs under the program will significantly exceed the demand anticipated by the presently-approved Program. UNS Electric’s affiliate, Tucson Electric Power Company (“TEP”), had overwhelming success during the first six months after implementation (July 2008 – December 2008) of an identical CFL Buydown Program, achieving 129.5% of the total annual lamp sales anticipated for the entire year. Consequently, TEP was forced to initiate changes to slow participation in the Program. Moreover, preliminary CFL sales for January and February 2009 suggest that demand for CFL lamps remains robust. UNS Electric’s preliminary numbers from January and February 2009 indicate similar results.

Based on TEP’s and UNS Electric’s experiences, UNS Electric is proposing an increase to the annual budget for the UNS Electric Program, and has provided a new analysis for 2009 through 2013. The proposed budget and Program benefit are outlined below in Table 2 through Table 5, as compared to the original budget and benefit approved in Decision No. 70556.

UNS Electric anticipates lamp sales to increase from 82,802 lamps (the approved 2009 budget maximum) to 200,255 lamps with the increased funding allowance. The weighted average Total Resource Cost Test (“TRC”) for the Program, with increased funding, will increase from 1.92 to 4.91.

In this updated CFL Buydown Program, UNS Electric proposes that the Commission grant UNS Electric authority to 1) increase funding for the Program based on the new 5-year analysis for 2009 through 2013 as outlined in the Program, and 2) recover all costs associated with the Program through the DSM Surcharge that will be effective June 1, 2009. The incremental increase in the DSM Surcharge to recover the increased CFL Program cost will be \$0.0001 in 2009, as shown below.

Budget Amount	Projected kWh Sales (2009)	DSM Adjustor (incremental)
\$148,611	1,817,013,000	\$0.0001

II. 2008 Program Details

The Program promotes energy efficient (“EE”) Energy Star-approved lighting products. UNS Electric selected Ecos Consulting, Inc. (“ECOS”) as the implementation contractor (“IC”) to deliver the Program in the UNS Electric service territory. Qualified products include CFLs in a wide range of sizes and configurations. Discount pricing is passed on to consumers through a negotiated agreement with lighting manufacturers and retailers. The Program is an up-stream intervention program, and operates by soliciting discount pricing from manufacturers through a bid process, then distributing qualifying products through retailers in UNS Electric’s service region. Customers are referred to participating retailers to purchase products. Participating retailers include, but are not limited to, Costco, Home Depot, Lowes, WalMart, Sam’s Club, Ace Hardware, and 99 Cent stores.

Based on the success of the TEP Energy Star Lighting Program, UNS Electric expects sales numbers far greater than anticipated. UNS Electric prefers not to discontinue promotion of the Program early in the year, reduce the variety of products and the number of retailers participating, or reduce the manufacturer’s buydown to slow product sales due to a budget shortfall.

UNS Electric, Inc.
Compact Fluorescent Lamp Buy-Down Program

Information in Table 1, below, shows the actual monthly sales for various CFL products from the TEP Energy Star Lighting Program. This information was used to determine the percentage distribution by lamp type in the new cost-benefit analysis for the request for additional funding for UNS Electric. Even though this information is specific to the TEP service territory UNS Electric believes the documented lamp types and wattages purchased in the TEP area is far more representative to expectations in the UNS Electric service area than the estimates included in the original UNS Electric analysis. Although UNS Electric's Program has not been in effect long enough to generate significant empirical information on CFL sales levels, preliminary results indicates that sales in the Program's first two full months of operation are higher than anticipated.

Table 1, Actual CFL Sales July-December 2008 (TEP Program)

CFL Wattage Sold	Incandescent Wattage Replaced	Total July 2008	Total July - Aug 2008	Total July - Sept 2008	Total July - Oct 2008	Total July - Nov 2008	Total July - Dec 2008
7	40	0	0	738	3 246	5 892	7 800
9	40	0	696	1 352	1 352	1 384	1 384
9	40	0	4 836	10 040	10 040	10 040	10 040
11	40	1 652	5 640	8 440	10 472	12 816	15 200
13	60	0	0	965	21 437	40 285	50 812
13	60	8 040	32 193	74 546	91 369	104 640	145 451
14	65	0	1 726	3 422	5 354	7 134	8 668
14	50	0	224	478	710	859	912
14	60	0	824	1 610	1 934	2 080	2 482
14	60	0	15 108	22 432	30 884	39 256	47 756
15	60	0	0	0	188	812	936
15	65	1 296	5 268	9 048	12 741	17 001	23 325
18	75	3 378	9 390	15 018	19 470	23 184	23 586
19	75	0	542	1 046	1 448	1 884	2 218
23	120	496	2 543	3 835	5 188	6 720	10 825
23	90	0	210	468	744	986	1 106
23	100	3 018	12 963	21 553	29 324	37 904	42 741
42	150	0	46	90	144	185	249
Cumulative Sales by Month		17,880	92,209	175,081	246,045	313,062	395,491

III. Program Eligibility

The Program is available to all UNS Electric customers, but normally attracts residential and small commercial customers.

IV. Rationale for Increased Funding

Additional funding is required to maximize the ability for UNS Electric to meet the following Program objectives.

- Reduce peak demand and energy consumption for residential and small business customers;
- Increase the purchase and installation of CFLs;
- Increase the availability of EE lighting products in the marketplace, and
- Increase the awareness and knowledge of retailers and UNS Electric customers on the benefits of EE lighting products.

UNS Electric, Inc.
Compact Fluorescent Lamp Buy-Down Program

UNS Electric believes customers will get the wrong signal about the importance of EE, if UNS Electric promotes a program for only a few months each year and then discontinues the promotion due to lack of funding. The request for additional funding shows UNS Electric's commitment to achieving the maximum energy reduction possible.

UNS Electric wishes to increase funding availability to allow for full-scale operations, consistent consumer education, unrestricted retailer participation and a full-line of CFL product promotions without the need to slow participation during the year. ECOS, the IC contractor, has provided a budget estimate they believe is reasonable to allow for full-scale operations consistently throughout the year.

V. Budget Comparison

The budget shown in Table 2, below, represents the original budget approved for this Program in Decision No. 70556. The proposed budget request for 2009 – 2013 is included in Table 3, below. Tables 2 and 3 includes an escalation rate of 3% per year. A breakdown of the proposed budget detail is shown in Table 6 in Section VII.

Table 2 - 2008 – 2012 Original Program Budget

Year	2008	2009	2010	2011	2012
Total budget	\$225,000	\$231,750	\$238,703	\$245,864	\$253,239
Incentives	\$124,605	\$128,343	\$132,193	\$136,159	\$140,244
Administrative Costs	\$100,395	\$103,407	\$106,509	\$109,704	\$112,995
Incentives as % of Budget	55.4%	55.4%	55.4%	55.4%	55.4%

Table 3 - Proposed 2009-2013 Program Budget

Year	Original 2009	New 2009	New 2010	New 2011	New 2012	New 2013
Total budget	\$231,750	\$340,000	\$350,200	\$360,706	\$371,527	\$382,673
Incentives	\$128,343	\$233,376	\$240,377	\$247,589	\$255,016	\$262,667
Implementation Costs	\$103,407	\$106,624	\$109,823	\$113,117	\$116,511	\$120,006
Incentives as % of Budget	55.4%	68.6%	68.6%	68.6%	68.6%	68.6%

VI. Sales, Demand and Energy Savings Comparison

Information in Table 4, below, represents the original projection of energy savings for the Program approved in Decision No. 70556. Table 5, below, shows the new projection of energy savings for 2009-2013 for the Program with Commission approval for UNS Electric's request for additional funding. The significant increase in kW and kWh compared to the original Program design occurs because the TEP Program results show actual lamp sales by wattage rather than an estimate of the percent distribution by lamp wattage used in the original projection. It is more accurate to calculate a future result on current sales in a neighboring region than to estimate participation rates.

Table 4 - 2008-2012 Original Sales, Demand and Energy Savings Projection

Year	2008	2009	2010	2011	2012
Projected Lamp Sales	80,390	82,802	85,286	87,845	90,480
Non-Coincident Peak (kW)	3,019	3,109	3,202	3,299	3,398
Coincident Peak (kW)	302	311	320	330	340
Energy Savings (kWh)	2,578,235	2,655,582	2,735,249	2,817,307	2,901,826

UNS Electric, Inc.
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Table 5 - Sales, Demand and Energy Savings Projections

Year	Original 2009	New 2009	New 2010	New 2011	New 2012	New 2013
Projected Lamp Sales	82,802	200,255	206,263	212,451	218,824	225,389
Non-Coincident Peak (kW)	3,109	10,219	10,525	10,841	11,166	11,501
Coincident Peak (kW)	311	1,022	1,053	1,084	1,117	1,150
Energy Savings (kWh)	2,655,582	11,261,022	11,598,853	11,946,819	12,305,223	12,674,380

VII. Budget Allocation for 2009 - 2013

The annual budget of \$340,000 will be allocated as shown in Table 6, below. The most significant changes will be a higher dollar allocation for incentives, an increase in IC training activity for consumer education and overhead associated to delivery of the Program to rural areas, and a reduced percentage of the budget for in-house administration. UNS Electric believes this increased budget is necessary to maximize the success of the Program.

Table 6 - 2009-2013 Budget Allocation

2009 Budget Allocation Estimate		
Total Program Budget for 2009	\$340,000	(%)
Program Management and Planning	\$10,200	3.0%
TEP Managerial & Clerical	\$4,080	40.0%
TEP Travel & Direct Expenses	\$3,060	30.0%
Overhead	\$3,060	30.0%
<i>Total Administrative Cost</i>	<i>\$10,200</i>	<i>100.0%</i>
Total Marketing Allocation	\$57,800	17.0%
Internal Marketing Expense	\$28,900	50.0%
Subcontracted Marketing Expense	\$28,900	50.0%
<i>Total Marketing Cost</i>	<i>\$57,800</i>	<i>100.0%</i>
Total Direct Implementation	\$265,200	78.0%
Financial Incentives to Upstream Participants	\$233,376	88.0%
Consumer Education - Labor	\$14,586	5.5%
Implementation Contractor Direct Expense	\$14,586	5.5%
Travel and Training	\$2,652	1.0%
<i>Total Direct Installation Cost</i>	<i>\$265,200</i>	<i>100.0%</i>
Total EM&V Cost Allocation	\$10,200	3.0%
EM&V Activity	\$5,713	56.0%
EM&V Overhead	\$4,487	44.0%
<i>Total EM&V Cost</i>	<i>\$10,200</i>	<i>100.0%</i>
<i>Total Program Cost</i>	<i>\$343,400</i>	<i>101.0%</i>

UNS Electric, Inc.
Compact Fluorescent Lamp Buy-Down Program

Table 7 - 2009-2013 Budget Allocation

2008 Original Budget Allocation		
Total Program Budget	\$225,000	(%)
Program Management and Planning	\$18,000	8.0%
TEP Managerial & Clerical	\$5,616	31.2%
TEP Travel & Direct Expenses	\$288	1.6%
Overhead	\$12,096	67.2%
<i>Total Administrative Cost</i>	<i>\$18,000</i>	<i>100.0%</i>
Total Marketing Allocation	\$38,250	17.0%
Internal Marketing Expense	\$19,125	50.0%
Subcontracted Marketing Expense	\$19,125	50.0%
<i>Total Marketing Cost</i>	<i>\$38,250</i>	<i>100.0%</i>
Total Direct Implementation	\$159,750	71.0%
Financial Incentives to Upstream Participants	\$124,605	78.0%
Consumer Education - Labor	\$0	0.0%
Implementation Contractor Direct Expense	\$1,598	1.0%
Travel and Training	\$33,548	21.0%
<i>Total Direct Installation Cost</i>	<i>\$159,750</i>	<i>100.0%</i>
Total EM&V Cost Allocation	\$9,000	4.0%
EM&V Activity	\$5,041	56.0%
EM&V Overhead	\$3,959	44.0%
<i>Total EM&V Cost</i>	<i>\$9,000</i>	<i>100.0%</i>
<i>Total Program Cost</i>	<i>\$225,000</i>	<i>100.0%</i>

VIII. Measurement, Evaluation and Research Plan

UNS Electric selected Summit Blue Consulting to provide Measurement, Evaluation and Research (“MER”) work for all approved DSM programs. Summit Blue will provide UNS Electric with ongoing feedback on Program progress and enable management to adjust or correct the Program measures to be more effective, provide a higher level of service, and be more cost beneficial. Integrated data collection will provide a high quality data resource for evaluation activities.

IX. Projected Environmental Benefits

Information in Table 8, below, outlines the projected environmental benefits this Program will provide if UNS Electric is able to meet energy savings projections outlined in Table 5 in Section VI.

Table 8 -Projected Environmental Benefits, 2009 - 2013

SOx	46,633	lbs
NOx	150,661	lbs
CO ₂	97,212,519	lbs

UNS Electric, Inc.
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X. Program Cost Effectiveness

The cost effectiveness of each measure and each Program, as a whole, was assessed using the TRC test, the Societal Cost ("SC") test and the Ratepayer Impact Measure ("RIM") test. Measure analysis worksheets showing all energy savings, cost and cost-effectiveness calculations are included in Appendix 1.

The cost effectiveness analysis requires estimation of:

- Net demand and energy savings attributable to the Program;
- Net incremental cost to the customer of purchasing qualifying products;
- UNS Electric's Program administration costs;
- Present value of Program benefits including UNS Electric Avoided Costs ("AC") over the life of the measures; and
- UNS Electric lost revenues.

In addition to estimating the savings from each measure, this analysis relies on a range of other assumptions and financial data. Table 9, below, summarizes data used in the cost effectiveness analysis and the data sources.

Table 9 - Cost-Effectiveness Analysis Assumptions

Conservation Life (yrs):	6.21
Program Life (yrs):	5
Demand AC (\$/kW):	\$56.66
Summer Energy AC (\$/kWh):	\$0.0710
Winter Energy AC (\$/kWh):	\$0.0710
Ratio of Non-Incentive to Incentive Costs	45.7%
IRP Discount Rate:	8.50%
Social Discount Rate	5.00%
NTG Ratio:	60%

Table 10, below, provides a summary of the benefit/cost analysis results for this Program.

Table 10. Benefit/Cost Analysis Results Summary

Cost Effectiveness Tests	TRC	SC	RIM
Benefit/Cost Ratio	4.39	4.91	0.43

UNS Electric, Inc. Compact Fluorescent Lamp Buy-Down Program

Appendix 1 – Measure Level Energy Savings and Benefit Cost Calculations

Incentive Calculations
RL1.130 – Retrofit Residential Incandescent to Integral Compact Fluorescent Lighting (CFL)

PROGRAM DATA		RATE DATA		OPERATING DATA		OTHER FACTORS	
Conservation Life (yrs):	6.21	Rate:	0.00	On-Pk Op. Hours:	181	Line Loss Factor:	10.65%
Program Life (yrs):	5	\$/kWh:	0.10078	Off-Pk Op. Hours:	823	Capacity Reserve Factor:	0.00%
Demand AC (\$/kWh):	\$56.66	\$/kWh, On-Peak:	0.10078	Summer Ratio:	50%	Application:	ROB
Summer On-pk Energy AC (\$/kWh):	\$0.07100	\$/kWh, Off-Peak:	0.10078	Winter Ratio:	50%	Cost Basis:	Incremental Equip
Summer Off-pk Energy AC (\$/kWh):	\$0.07100			Coincidence Factor:	0.10		
Winter On-pk Energy AC (\$/kWh):	\$0.07100			HVAC Interaction Factor (Demand)***:	0.00		
Winter Off-pk Energy AC (\$/kWh):	\$0.07100			HVAC Interaction Factor (Energy)***:	0.00		
Ratio of Non-inc to Incentive Costs	45.7%						
IRP Discount Rate****:	8.50%						
Social Discount Rate	5.00%						
NTG Ratio:	60%						

DEMAND/ENERGY SAVINGS		INCENTIVE CALCULATIONS				CUSTOMER COST/SAVINGS				WGT.	% Incent	B/C							
Fixture Type	Inc. Fixture Watt Range	CFL Fixture Watts*	CFL Fixture Lumen Range	Non-Coincident Demand Savings (kW)	Off-pk Energy Savings (kWh)	IRP Benefit (\$)	PV Benefit (\$)	Social Benefit (\$)	Recommended Incentive (\$)	% PV	Program Cost (\$)	NPV (\$)	Incr. Cost (\$)	Cost Savings (\$)	Payback w/Inc. (yrs)	Weighting Factor	(%)	TRC	
	40	7	7	0.033	11	9	10	10	1.00	11%	3	6	3.75	4	1.0	0.7	1.97%	27%	3.3
	40	9	9	0.031	11	9	10	10	1.00	12%	3	6	3.75	4	1.0	0.8	0.35%	27%	3.1
	40	11	11	0.029	10	8	9	9	1.00	12%	3	5	3.75	3	1.1	0.8	2.54%	27%	3.1
	60	13	13	0.047	14	12	14	14	1.00	8%	3	10	3.62	5	0.7	0.5	3.84%	27%	3.0
	60	13	13	0.047	14	12	14	14	1.00	8%	3	10	3.62	5	0.7	0.5	12.85%	28%	4.7
	65	14	14	0.051	14	13	15	15	1.00	8%	3	10	3.95	6	0.7	0.5	36.78%	28%	5.2
	50	14	14	0.036	12	10	11	11	1.00	10%	3	7	3.95	6	0.7	0.5	2.19%	25%	4.7
	60	14	14	0.046	13	12	14	14	1.00	8%	3	9	3.95	4	1.0	0.7	0.23%	25%	3.4
	60	14	14	0.046	13	12	14	14	1.00	8%	3	9	3.95	5	0.8	0.6	0.63%	25%	4.8
	60	15	15	0.045	13	12	13	13	1.25	11%	3	9	4.43	5	0.9	0.6	12.08%	25%	4.3
	65	15	15	0.050	14	13	15	15	1.25	10%	3	10	4.43	5	0.8	0.6	0.24%	25%	4.3
	75	18	18	0.057	15	15	16	16	1.25	8%	4	11	5.08	6	0.8	0.6	5.80%	28%	3.7
	75	19	19	0.056	15	14	16	16	1.75	8%	4	11	5.08	6	0.8	0.6	5.96%	28%	4.0
	120	23	23	0.097	23	24	27	27	1.75	7%	4	20	5.96	10	0.6	0.4	0.56%	33%	4.1
	90	23	23	0.067	17	17	19	19	1.50	9%	4	13	5.96	7	0.8	0.6	2.74%	29%	4.0
	100	23	23	0.077	19	19	22	22	2.00	10%	4	15	5.96	8	0.7	0.5	10.81%	34%	4.5
	150	42	42	0.108	25	27	30	30	2.50	9%	6	21	7.39	11	0.6	0.4	0.05%	34%	4.9
	Weighted Average			0.051	14.24	13.29	14.86	14.86	1.17	9%	3.03	10.26	4.16	6	0.75	0.54	100%	28%	4.39

Actual Lamp Watts and Replacement
Watts from TEP Dec 2008 ECOS
Report

Average Rebate for
ea from 2008
ECOS email

New breakdown using
Summit 'Cost
Assumptions' tab

Actual Wtg Factor
From TEP Dec 2008
ECOS Report