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BEFORE THE ARIZONA CORPORATION COMMISSION

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ARIZONA CORPORATION COMMISSION
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DOCKETED BY	
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IN THE MATTER OF THE PROPOSED
RULEMAKING REGARDING RESOURCE
PLANNING

Docket No. RE-00000A-09-0249

SWEEP COMMENTS ON THE
PROPOSED RULEMAKING
REGARDING RESOURCE
PLANNING

11
12 The Southwest Energy Efficiency Project (SWEET) appreciates the opportunity to
13 provide comments on the proposed Rulemaking Regarding Resource Planning.
14

15 SWEET supports and urges the Commission to adopt the Resource Planning Rule.
16 Improvements in the Resource Planning process as set forth in the proposed Rule will
17 help ensure the provision of reliable energy service to Arizona customers at reasonable
18 costs. Therefore, the proposed Rule is in the public interest.
19

20 SWEET has reviewed the comments submitted by other parties and the
21 amendments posted in the docket. SWEET provides the following comments and
22 suggestions on three sections of the proposed Resource Planning Rule below.
23

24 **ENVIRONMENTAL IMPACTS**

25
26 Page 15, insert the following as a new number 16 in D:
27

28 16. A plan for reducing environmental impacts including air emissions, solid waste, and
29 water consumption. The environmental impacts should be monetized, using
30 Commission-approved or industry values, whenever their monetization and inclusion in
31 economic and cost-effectiveness analysis would have a significant impact on the results
32 of the analysis conducted for the resource plan. The specific numerical values or factors
33 for the monetization of environmental impacts may be developed and reviewed by the
34 Commission in other proceedings or stakeholder workshops.
35

36 Renumber to conform.

1 **SUGGESTED REVISIONS FOR THE DEMAND MANAGEMENT PROGRAMS**

2
3 The revisions suggested below (in redline/revisions mode) will ensure the internal
4 consistency of the Resource Planning Rule with the current Commission practice for demand-
5 side management (DSM) programs and resources, and therefore will help ensure the complete
6 analysis and fair treatment of DSM programs and resources in the resource planning process.

7
8 Page 14-15, make the following revisions in sections 14 and 15:

- 9
10 14. A description of the demand management programs or measures included in the 15-year
11 resource plan, including for each demand management program or measure:
12 a. How and when the program or measure will be implemented;
13 b. The projected participation level~~rate~~ by customer class for the program or measure;
14 c. The expected change in peak demand and energy consumption resulting from the
15 program or measure;
16 d. The expected reductions in environmental impacts including air emissions, solid waste,
17 and water consumption attributable to the program or measure;
18 e. The expected societal benefits, societal costs, and cost-effectiveness of the program or
19 measure;
20 fe. The expected life of the measure; and
21 gf. The capital costs, operating costs, and maintenance costs of the measure, and the
22 program costs;
23 15. For each demand management measure that was considered but rejected:
24 a. A description of the measure
25 b. The estimated change in peak demand and energy consumption from the measure;
26 c. The estimated cost-effectiveness of the measure;
27 d~~b~~. The capital costs, operating costs, and maintenance costs of the measure, and the
28 program costs; and
29 ee. The reason for rejecting the measure; and

30
31 Renumber to conform.

32
33 **TIMING AND PROCESS FOR STAFF AND COMMISSION REVIEW**

34
35 Sections 704(A) and (B) pertain to Staff and Commission review of the resource plans.
36 As set forth in the proposed Rule currently, by time the Commission acknowledges a plan (15
37 months after the plan is filed), the plan would likely be somewhat out-of-date and a new plan
38 would be filed in nine months. SWEEP recommends more timely review of the resource plan by
39 Staff and the Commission. SWEEP suggests, at most, a four-to-six month review by Staff and
40 interested parties, with a Commission decision two-to-four months later (the four month
41 timeframe would allow time for a hearing).