



Arizona Consumers Council

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AZ CORP COMMISSION
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March 4, 2010

Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
Via Hand Delivery

Arizona Corporation Commission
DOCKETED

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Re: Docket Number Docket Number RE-00000C-09-0427

DOCKETED BY [Signature]

Dear Commissioners:

I write on behalf of the Arizona Consumers Council, and its 1,000-plus members, many of whom are APS customers. The Arizona Consumers Council has been educating, protecting and advocating on behalf of Arizona consumers for over 40 years. Much of our work has been on energy and utility issues. We write today regarding the proposed rules regarding energy efficiency.

First, we thank you for your focus on this important issue. Energy efficiency benefits consumers both in the short run, because it saves them money, and in the long run, because it reduces the impact on our environment. It may also reduce the need for utilities to make capital expenditures, thus reducing one source of upward pressure on rates. As a recent study by the Consumer Federation of America notes, "energy efficiency is the cornerstone to ensuring affordable energy for American households in the decades ahead. . . [because] [i]t costs much less to save energy than it does to produce it." Mark Cooper, *Building on the Success of Energy Efficiency Programs to Ensure an Affordable Energy Future: State-by-State savings on Residential Utility Bills from Aggressive Energy Efficiency Policies*, Consumer Federation of America, at i, February 2010.

Having addressed in past submissions to the Commission the benefits of energy efficiency, we will describe here the kinds of energy efficiency requirements that we hope the Commission will impose. First, it's important that utilities be required to meet specific standards over a clear timeline. We join those who suggest 20% by 2020.

There should be wide variety of energy efficiency programs, so that consumers can save in many different ways, such as weatherization, help with replacing lightbulbs, rebates on purchases of energy efficient appliances, assistance in making landscaping decisions, and help with window replacement. Programs that help low-income consumers implement energy efficiency measures are especially important, since such consumers truly benefit from the increased savings. Innovative programs that help other consumers finance some of the more expensive methods of energy efficiency should also be available.

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It is also important that consumers be able to get easy access to clear, understandable information tailored to their homes to help them decide which energy efficiency measures will help them save the most money, and to help them avoid spending money on technology that won't provide them with any benefit.

Consumers also benefit when businesses and government implement energy efficiency measures. In fact, effective use of energy efficiency by those who need more energy stands to provide a proportionally greater benefit to the environment. For that reason, technical assistance to businesses that want to use energy efficiently is just as important as such assistance is to residential users. And, in these tough times, schools need all the help they can get with their budget; please ensure that there is continued help for schools in reducing their energy costs.

The Arizona Consumers Council thanks you for including our comments in your consideration of this matter.

Respectfully yours,



Leslie Kyman Cooper
Executive Director