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OPOWER, an energy efficiency company using behavioral science and data analytics to drive reductions in residential energy consumption, writes to support the Arizona Corporation Commission's ("ACC") decision to establish energy efficiency targets for its natural gas utilities.

Momentum behind energy efficiency has been growing nationwide, with the number of states with energy efficiency mandates growing in recent years. Arizona has been a critical part this momentum, with the ACC establishing electric energy efficiency standards earlier this year. OPOWER commented on these standards, noting the Commission's firm commitment to efficiency in the state. In Rulemaking R14-2-2504 the Commission has chosen to take its commitment to energy efficiency one step further by establishing savings targets for natural gas utilities.

OPOWER is pleased to see that the state's regulations not only mandate efficiency targets, but in establishing a broad definition of "efficiency measure," are also supportive of new, innovative models of achieving these savings. It is exactly this framework that makes the proposed energy efficiency targets aggressive yet achievable for Arizona's utilities.

Arizona Corporation Commission
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