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BEFORE THE ARIZONA CORPORATION COMMISSIC

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AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE NOTICE OF
PROPOSED RULEMAKING ON GAS
ENERGY EFFICIENCY.

DOCKET NO. RG-00000B-09-0428

**COMMENTS OF WESTERN
RESOURCE ADVOCATES**

Western Resource Advocates hereby submits the following comments, intended to clarify the proposed gas energy efficiency rule.

R14-2-2501 (17)(c). "Health effect ..." should be "Health effects ..."

R14-2-2504(C). The statement "At least 4.5 percentage points of the energy efficiency standard set forth in subsection (B) shall be achieved through energy efficiency programs" is unclear. Subsection B refers to annual standards listed in Table 1 and an affected utility could not, for example, meet the 2011 standard of 0.50% with 4.5 percentage points of energy efficiency programs. Either the reference should be changed to subsection (A), pertaining to the 2020 goal of 6%, or the sentence should be rewritten to state "At last 75% of each year's energy efficiency standard as set forth in Table 1 shall be achieved through energy efficiency programs."

R14-2-2504 (G). It is not clear how Staff intends the second sentence, pertaining to counting all energy savings resulting from other RET projects not sponsored by an affected utility, would work. An example may clarify the intent.

Respectfully submitted this 7th day of August, 2010 by:

Arizona Corporation Commission

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AUG 10 2010

DOCKETED BY *DB*

David Berry
Chief of Policy Analysis
Western Resource Advocates
PO Box 1064
Scottsdale, AZ 85252-1064

Original and 13 copies mailed to Docket Control, Arizona Corporation Commission, 1200 W. Washington St., Phoenix, AZ 85007.