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August 24, 2010

Arizona Corporation Commission

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Chairperson Mayes and Members
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

RE: Docket Number RG-00000B-09-0428 Gas Energy Efficiency and the Gas Utility Energy Efficiency Standards

Dear Chairperson Mayes and Members of the Arizona Corporation Commission:

On behalf of the Sierra Club's Grand Canyon Chapter and our 12,000 members in Arizona, I want to express our support and appreciation for the Arizona Corporation Commission's significant commitment to increasing energy efficiency and promoting clean renewable energy, both of which will help Arizona reduce its emissions of air pollutants and greenhouse gas emissions, plus benefit consumers. Many of our members have natural gas service that is affected by this rule and will see the economic benefits. All of us will realize the environmental benefits.

A standard to achieve 6 percent energy savings by 2020 is a reasonable standard for Arizona. Increasing energy efficiency as proposed in this Gas Energy Efficiency Rule will provide several benefits to gas utility ratepayers, including both residential and business customers. The benefits are cost effective – Arizonans will benefit from lower gas bills with a reasonable investment. We are especially interested and supportive of the environmental benefits, however, which include cleaner air as a result of reductions in oxides of nitrogen and in reducing carbon dioxide greenhouse gas emissions. Methane is also emitted when natural gas does not burn completely and methane is a powerful greenhouse gas. Reducing natural gas consumption can also help reduce methane emissions.

Another important benefit of investing in energy efficiency measures is it helps to create jobs, something critical at a time when unemployment is high and the economy continues to lag.

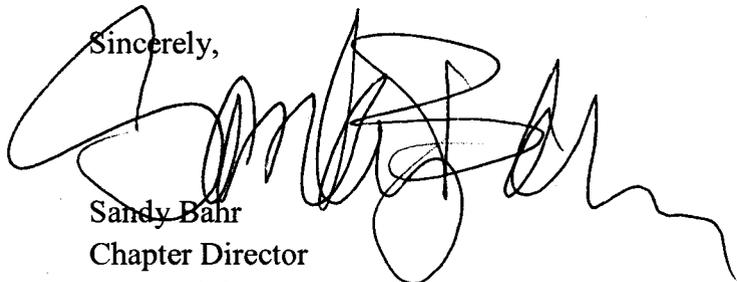
We support the Southwest Energy Efficiency Project (SWEET) recommendations for improving the proposed rule, including a provision to only allow the utility to count the energy savings resulting from energy efficiency building codes and appliance standards, if the utility demonstrates and documents its efforts to support the adoption and implementation of energy efficiency building codes and appliance

standards. If the building code and appliance standards are improved without the support the affected utility, that utility should not be able to count this toward its energy savings.

We also agree that provision for three-quarters of the energy savings coming from the energy efficiency programs apply to every year set forth in the Gas Energy Efficiency Standard, and not just to 2020.

Thank you for considering our comments and again for your support of increasing energy efficiency in throughout Arizona.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Sandy Bahr', written over the typed name.

Sandy Bahr

Chapter Director

Sierra Club – Grand Canyon Chapter