

ORIGINAL

OPEN MEETING AGENDA ITEM



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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Arizona Corporation Commission
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JAN 11 2012

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IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF THE COMPANY'S 2012
DEMAND SIDE MANAGEMENT
IMPLEMENTATION PLAN.

DOCKET NO. E-01345A-11-0232

**COMMENTS OF WESTERN RESOURCE
ADVOCATES ON COMMISSIONER
BURNS' AMENDMENT #2**

Western Resource Advocates (WRA) hereby submits comments on Commissioner Burns' Amendment # 2 concerning her proposal for a pilot project to implement online training for the shade tree program.

Currently APS' implementation contractor, a non-profit organization, uses workshops for educating program participants and uses events to distribute trees to participants who have attended a workshop. A variety of methods have been used around the country to educate tree program participants, including sending an urban forester to visit each participant prior to distributing the trees, providing written instructions, and using videos.

If the Commission adopts Burns Amendment # 2, the project must be carefully designed to yield useful and reliable results. For example, participants should be randomly assigned to the online or workshop sessions, and follow-up inspections of a stratified sample of online and workshop participants' yards regarding the location and condition of trees should be conducted to compare the results of the different training methods. In addition, APS or its implementation contractor should survey participants about the usefulness of the education programs. Further, the program budget reduction should be revisited to accommodate the online training and evaluation.

WRA would also like to provide some context for the current design of APS' shade tree program. We reviewed the experience of 24 non-profit tree planting organizations and about a dozen other non-profit organizations which implement energy efficiency programs.¹ Their experience highlights the importance of the social aspects of some energy efficiency programs:

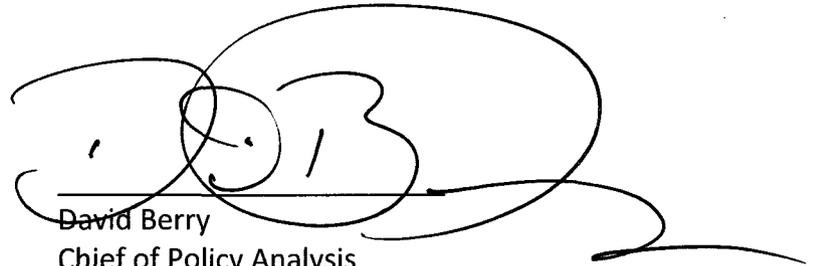
¹ Western Resource Advocates, *Phoenix Green: Designing a Community Tree Planting Program for Phoenix, Arizona*, 2009. David Berry, "Delivering Energy Savings through Community-Based Organizations," *The Electricity Journal*, vol. 23 (November 2010): 65-74.

- Most community-based tree planting and other efficiency programs rely on social networks to attract participants.
- The non-profit organizations draw upon their credibility and reputations to recruit participants.
- The process encourages civic engagement.

These social aspects of efficiency program design may increase participation in efficiency programs which is crucial to meeting the Commission's energy efficiency goals. In addition, participants may have a greater sense of ownership of the program, leading them to follow-through and actually plant the trees. And third, the trees may have a higher probability of surviving and delivering energy savings as a result of the educational components of the community-based effort.

WRA would like to thank the Commission for considering these comments. We appreciate the Commission's leadership role in advancing energy efficiency measures which reduce wasted energy, lower the costs of providing electric energy services, benefit program participants and customers in general, and reduce air emissions.

Respectfully submitted this 11th day of January, 2012 by:

A handwritten signature in black ink, appearing to be 'D. Berry', enclosed within a large, loopy circular scribble.

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

Electronic copies sent to parties of record.