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Arizona Corporation Commission
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March 16, 2012

Chairman Gary Pierce
Commissioners Bob Stump, Paul Newman, Sandra Kennedy, and Brenda Burns
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Re: Comments on the TEP 2011-2012 Modified Energy Efficiency Implementation Plan and Recommended Order, DOCKET NO. E-01933A-11-0055

Dear Chairman Pierce and Commissioners:

I am submitting written public comments on the Tucson Electric Power (TEP) 2011-2012 Modified Energy Efficiency Implementation Plan and Recommended Order on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our 12,000 members, many of whom are TEP customers.

The Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." The Sierra Club and our members have a significant interest in this plan as promoting energy efficiency is a top priority for our chapter and for our organization overall.

We strongly oppose any amendments that would allow the company a waiver to the Energy Efficiency Standard. Energy efficiency continues to be the cleanest and least cost energy resource available. Energy efficiency provides significant benefits to TEP customers, the economy, and our environment by reducing pollution and water consumption, keeping more of our energy dollars in our state, and providing local jobs. Arizona's EE Standard is strong, something of which we can be proud, plus it is clearly in the public interest. TEP can and should meet the EE Standard's requirement of 22% energy savings by 2020.

The Sierra Club supports the energy efficiency programs determined to be cost-effective. These will result in delivering benefits to customers and to our air and water. Several new programs will provide small businesses and schools with additional ways to address building inefficiencies and upgrade facilities. Conservation programs for multi-family housing will provide opportunities for those who rent to reduce their electric bills and the appliance recycling program will help to move more efficient appliances into homes, while making sure the old ones are recycled appropriately.

The residential energy financing program will help to provide important funding to assist TEP ratepayers with implementing additional energy efficiency measures. It will open the door further to people who might not otherwise be able to implement these programs.

We are also pleased to see the proposed Energy Codes Enhancement Program included, which can help address barriers to building energy code adoption, which is something that can provide enormous benefits to our communities and to ratepayers. Ensuring more energy efficiency construction up front is one of the biggest cost effective measures we can take to reduce future energy consumption.

Finally, the Low Income Weatherization Program will help to make opportunities to lower electric bills through weatherization available to more customers. This is especially critical during these tough economic times and at a time when poverty rates are so high. We appreciate an expansion of this program being included in the plan.

In summary, we ask that you approve a strong EE Implementation Plan for TEP, that you maintain the commitment to EE programs as recommended by staff, and that you insist that TEP meet its commitments/requirements under Arizona's Energy Efficiency Standard.

Thank you for considering our comments.

Sincerely,

Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter