



Tucson Electric Power
Energy Efficiency
E-01933A-11-0055

RECEIVED

Chairman Gary Pierce
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996



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CORP COMMISSION
DOCKET CONTROL

Re: Tucson Electric Power Company's Application for Approval of its 2011-2012 Energy Efficiency Implementation Plan, E-01933A-11-0055

Arizona Corporation Commission

DOCKETED

JUN 19 2012

Dear Chairman Pierce and Commissioners,

DOCKETED BY *JM*

My name is Jeff Vogler and I am the co-owner of MVP Air Conditioning LLC in Tucson.

I just received a link from BPI to a form letter requesting that you approve TEP's Energy Efficiency Implementation Plan, E-01933A-11-0055. It goes on to say how the program saved homeowner's money and helped increase my business.

I want to tell you, frankly, that in our case nothing could be further from the truth. We are a small business with limited resources, as are 90% of the air conditioning contractors in Tucson. In the past it was simple. Buy a new heating and cooling system that meets specific minimum ratings and get a rebate. We could fill out the one page application for the customer, have them sign it and send it in, and get their rebate in a few weeks.

TEP's 2012 program wasn't so simple. It required us to get BPI certified (which we did). It required the purchase of \$6000 - \$10,000 in equipment (which we were in the process of acquiring at the time the program was put on hold). Please understand that our company, which is again similar to 90% of the 400+ AC contractors in Tucson, does AC service and replacement. We don't do whole house duct sealing or air sealing nor are we interested in doing so. We want to manage our growth and be smart about it, not biting off more than we can chew. Also, in the economy right now, people aren't looking for bells and whistles. They want value.

Under the 2012 program, for the customer to get a rebate for having a new high efficiency system installed we would need to blower door test their house before installation, which costs the customer time-and money, do duct sealing throughout the house which again is more time and money, and then go back and blower door test the house after the install. Again, more time and money. In the end we'd have to charge about \$1200 on top of what we would normally charge for an install to cover the extra labor and materials as well as the equipment.

The customer in turn would get a \$900 rebate for their new system and possibly up to \$350 back for the duct sealing based on the results of the two blower door tests. It's also possible they would get nothing back on the duct sealing if their ducts were tight to begin with and the duct sealing didn't improve anything.

The bottom line is they would spend \$1200 extra and get something between \$900 and \$1250 back. That's a hard sell right there and illustrates why we were ecstatic when the whole program got put on hold before we purchased any equipment. You can't go into a customer's home and tell them 'maybe you'll break even on this rebate program'. They want a rebate. They want it in writing. We are so much better off not having a rebate than to have to explain this thing to them.

As you can see we are obviously not in favor of that specific program returning. I do talk to other contractors and have yet to find anyone else who was in favor of it. I think the fact that, in my estimation, less than 5% of the AC contractors in Tucson showed up on the list on TEP's website speaks about how unpopular it was. The old program, which was simple and straightforward, had everyone signed up for it.

Thank you for taking my opinion into consideration.

Best Regards,

Jeff Vogler

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