

ORIGINAL

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



Antonio Gill

From: Bruce Plenk [Bruce.F
Sent: Thursday, July 12, 2012
To: Burns-Web; MAILBOX; Kennedy-Web; Newhall-Web; Pierce-Web; Stump-Web
Cc: Bruce Plenk
Subject: City of Tucson Comments on TEP EE Updated Modified Plan
Attachments: Testimony to ACC re TEP EE Plan 2012-07-08.doc

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AZ CORP COMMISSION
DOCKET CONTROL

Dear Chairman Pierce and Commissioners:

Please consider the following comments from the City of Tucson regarding the TEP Energy Efficiency Updated Modified Plan and place this in the Docket in this matter.

Thank you

Bruce Plenk
Tucson City Solar Energy Coordinator
[Redacted]
Tucson, AZ 85714
520 837-6322
bruce.plenk@tucsonaz.gov

Arizona Corporation Commission
DOCKETED
AUG 03 2012

DOCKETED BY [Signature]



MEMORANDUM

DATE: July 9, 2012

TO: Gary Pierce, Chairman
Arizona Corporation Commission **FROM:** Bruce Plenk
1200 West Washington City of Tucson Solar Coordinator
Phoenix, AZ 85007

Re: In the Matter of the Application of Tucson Electric Power (TEP) Company for Approval of its 2011-2012 Energy Efficiency (EE) Implementation Plan, **Docket No. E-01933A-11-0055**

Dear Chairman Pierce and Commissioners:

Thank you for the opportunity to present the position of the City of Tucson regarding TEP's proposed Energy Efficiency Proposal for the period 2011-2013. The City supports the Updated Modified Plan proposed by TEP in its May 3, 2012 filing for the following reasons.

As you know, the City of Tucson is a party to the Mayor's Climate Protection Agreement and has been working since 2008 to develop programs to reduce greenhouse gas emissions in both City operations and in the community. Most recently, Mayor & Council adopted a Climate Mitigation Report and Recommendations on December 20, 2011 (the City Report) to begin the first phase of actions to achieve these goals. Thirty four recommendations of the City's Climate Change Committee were adopted. The TEP proposal is consistent with and supports the specific programs set out in the City's Report. The TEP proposal is particularly important since the vast majority of greenhouse gas emissions are from residential and commercial users, not the City itself.

The City Report calls for investing in energy efficiency retrofits for residences and businesses and for greater energy efficiency in new construction. The TEP proposal provides financial incentives for just such programs. Importantly, the TEP proposal provides a cheaper way for Tucsonans to purchase this energy efficient equipment by buying down the interest rate on such equipment.

In addition to tracking the Climate Committee's recommendations, several of the programs in the TEP proposal are consistent with Mayor Rothschild's 180 day plan, specifically providing additional financing options for residents to obtain energy efficient equipment.

And the TEP proposal also includes a variety of financial incentives that could be utilized by the City itself to continue its position as a positive role model for sustainable city operations. These include funding for energy efficient measures at city apartment complexes, controllers on air conditioning units in city facilities, retro-commissioning of existing city buildings, and assistance in designing and constructing new energy efficient city buildings. All of these programs would be consistent with existing City policy requiring LEED Silver and 5% Solar for new city buildings and would assist in meeting City goals.