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BEFORE THE ARIZONA CORPORATI

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ARIZONA CORP COMMISSION  
DOCKET CONTROL

COMMISSIONERS

- BOB STUMP, Chairman
- GARY PIERCE
- BRENDA BURNS
- SUSAN BITTER SMITH
- BOB BURNS

IN THE MATTER OF THE APPLICATION OF )  
 TUCSON ELECTRIC POWER COMPANY )  
 FOR THE ESTABLISHMENT OF JUST AND )  
 REASONABLE RATES AND CHARGES )  
 DESIGNED TO REALIZE A REASONABLE )  
 RATE OF RETURN ON THE FAIR VALUE OF )  
 ITS OPERATIONS THROUGHOUT THE )  
 STATE OF ARIZONA. )

DOCKET NO. E-01933A-12-0291

NOTICE OF FILING OF  
SUMMARY TESTIMONY OF  
ENERNOC, INC.

EnerNOC, Inc. hereby provides notice of filing of the Summary Testimony of Mona Tierney-Lloyd in the above-docketed proceeding.

Dated this 5<sup>th</sup> day of March 2013.

Respectfully submitted,

*Lawrence V. Robertson, Jr.*

Lawrence V. Robertson, Jr.  
Attorney for EnerNOC, Inc.

The original and thirteen (13) copies of the foregoing will be filed this 5<sup>th</sup> day of March 2013 with:

Docket Control Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Arizona Corporation Commission

DOCKETED

MAR 5 2013

A copy of the same served by e-mail or first class mail that same date to:

DOCKETED BY *LM*

All Parties of Record

LAWRENCE V. ROBERTSON, JR.  
ATTORNEY AT LAW  
P. O. Box 1448  
Tubac, Arizona 85646

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**Summary of Prepared Direct Testimony  
Of  
Mona Tierney-Lloyd  
In Support of Settlement Agreement  
On Behalf of  
EnerNOC, Inc.**

EnerNOC, Inc. ("EnerNOC") provides valuable energy resources to utilities and grid operators by providing energy management services to commercial, institutional and industrial customers by reducing real-time demand for electricity, increasing energy efficiency, improving energy supply transparency in competitive markets and mitigating emissions. In that regard, EnerNOC currently has a four-year contract with Tucson Electric Power Company ("TEP") to provide energy efficiency services to TEP customers under TEP's Large Commercial Direct Load Control ("DLC") Program. EnerNOC was selected by TEP to provide the services contemplated under the DLC Program as a result of a competitive solicitation; and, the Commission approved the DLC Program on July 12, 2010 in its Decision No. 71787.

Mona Tierney-Lloyd is Director, Western Regulatory Affairs, for EnerNOC. She has previously testified before the Commission; and, last year she testified on behalf of EnerNOC in Docket No. E-01933A-11-0055, which pertains to TEP's 2011 Energy Efficiency Implementation Plan.

As indicated in Ms. Tierney-Lloyd's prepared Direct Testimony in support of the Settlement Agreement, EnerNOC supports the same as they affect, or conceivably could affect, EnerNOC, and particularly the proposed Energy Efficiency Resource Plan ("EERP") set forth at Article VII for the following reasons:

1. It adopts adequate annual funding for Commission-approved and effective EE programs;
2. It treats EE investments and cost recovery on a basis comparable to other supply-side resources;
3. It dampens rate impacts for consumers;
4. It provides a funding mechanism for EE programs, implementation contractors and customers;
5. It removes some of the economic disincentives to TEP engaging in EE programs by providing for a return on its investments and a reasonable period of time over which to recover its costs and return.

In addition, the EERP provides that TEP will resume funding of EE programs previously approved by the Commission beginning March 1, 2013. This is a particularly important aspect of the EERP from EnerNOC's perspective, since the DLC Program was approved by the Commission in July 2010, and TEP suspended EE program funding in the Spring of 2012, due to regulatory uncertainty as to its ability to timely recover EE program costs. As Ms. Tierney-Lloyd testifies, stability of the funding source and continuity of EE programs are of particular

**LAWRENCE V. ROBERTSON, JR.**  
ATTORNEY AT LAW  
P. O. Box 1448  
Tubac, Arizona 85646

1 importance to EnerNOC as an Implementation Contractor, as well as to TEP and those customers  
2 of TEP who desire to participate in its EE programs.

3 Finally, EnerNOC believes that the provisions of the EERP provide the Commission with  
4 several ongoing opportunities to exercise regulatory oversight as to the content and cost-  
effectiveness of EE programs undertaken by TEP.

5 Accordingly, for the reasons discussed by Ms. Tierney-Lloyd, EnerNOC supports the  
6 EERP as a part of the Settlement Agreement.

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