

ORIGINAL

BRENDA BURNS PROPOSED AMENDMENT NO. 1



TIME/DATE PREPARED: June 7, 2013

COMPANY: UNS Gas, Inc.

AGENDA ITEM NO. 23

DOCKET NO(S). G-04204A-11-0149

OPEN MEETING DATE: June 11-12, 2013

**Page 32, line 3**

INSERT new findings of fact:

112. We support the concept of energy efficiency but we think the process could and should be improved. We are not convinced that the current method of cost-effective analysis is the best way to ensure that ratepayer money is being invested in a prudent manner. We think there should be further discussion, outside of this implementation plan, to more fully explore the various options that could better analyze cost efficiency. We look forward to the opportunity to make sure that energy efficiency programs are truly cost effective.

113. As stated earlier, Staff's analysis estimates that UNS Gas only reached 0.201% of prior year retail energy sales, in 2011, despite the fact that the Energy efficiency standard called for 0.50%. In fact, UNS Gas has not been able to achieve the EE Standard targets, each year, which led Staff to propose a waiver from the GEES Standards. Even the most ambitious implementation plans cannot attain the EE Standards. Therefore, we do not think it is in the public interest to approve a budget that implements new programs and most changes to existing programs. We feel that this is one of many reasons why the entire EE process needs to be reviewed and possibly reformed. Consequently, we do not think it is in the public interest to approve a budget that implements new programs and most changes to current programs, at this time.

114. We decline to approve the Residential K-12 Education Program. We decline to approve the Solar Thermal Water Heating Program. The budget for Commercial & Industrial Facilities shall remain at \$218,545 and we decline to approve any of the proposed new programs, at this time. The incentive cap for C&I customers and incentive cap for school districts shall remain at \$8,000 and \$25,000, respectively. We decline to approve the new Multifamily Direct Install program. We decline to approve the Education and Outreach Program. We decline to approve the Energy Codes Support Program.

**Page 32, line 28**

INSERT: "not" before "approved"

**Page 33, line 3**

INSERT: "is not approved" after "Program" and DELETE the remainder of the sentence

Arizona Corporation Commission

DOCKETED

JUN 07 2013

DOCKETED BY [Signature]

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<b>THIS AMENDMENT:</b>			
_____ Passed _____	Passed as amended by _____		
_____ Failed _____	_____ Not Offered _____	_____ Withdrawn _____	

**Page 33, lines 4-7**

DELETE and REPLACE with: "IT IS FURTHER ORDERED that UNS Gas Inc.'s existing Commercial & Industrial Facilities program is approved, in accordance with Finding of Fact 113."

**Page 33, lines 9**

INSERT: "not" before "approved"

**Page 33, lines 11**

INSERT: "not" before "approved"

**Page 33, lines 13**

INSERT: "not" before "approved"

**Page 33, lines 14-15**

DELETE and REPLACE with: "IT IS FURTHER ORDERED that the total budget be set at \$1,612,582 for 2013 with the budget flexibility recommended by Staff in Finding of Fact 103."

**Page 33, line 16**

DELETE: "\$0.0131" and replace with conforming changes

**PLEASE MAKE ALL CONFORMING CHANGES.**