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BEFORE THE ARIZONA CORPORATION COMMISSION

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Docket No. E-01345A-12-0224

8 IN THE MATTER OF THE APPLICATION OF
 9 ARIZONA PUBLIC SERVICE COMPANY-
 10 APPLICATION FOR APPROVAL OF
 11 ITS 2013 DEMAND-SIDE MANAGEMENT
 12 IMPLEMENTATION PLAN AND
 13 REQUEST FOR RELIEF FROM ARIZONA
 14 ADMINISTRATIVE CODE R14-2-
 15 2404 (E) AND (H) (DOCKET NO. E-01345A-
 16 12-0224

Arizona Corporation Commission
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COMMENTS ON APS' PROPOSED AMENDMENTS

14 The Residential Utility Consumer Office ("RUCO") submits the following comments in
 15 response to Arizona Public Service Company's ("APS") filing on March 5, 2014. In the filing,
 16 APS suggests two amendments to their 2013 Demand-Side Management ("DSM")
 17 Implementation Plan ("2013 DSM Plan") that would allow facilities, generation, transmission,
 18 and delivery system improvements to count toward the energy efficiency standard.

19 At this time, RUCO cannot support APS' proposal to include these improvements toward
 20 the energy efficiency standard. There is simply not enough information in APS' filings to make
 21 an informed decision. There has been no study of the costs and benefits let alone a detailed
 22 measurement, evaluation, and research plan to describe the verification of energy savings.

1 RUCO is not alone in this assessment as both Staff and SWEEP also oppose APS' proposal in
2 its current form.

3 Following the "status quo" position of the Commission, RUCO has only offered very small
4 and well vetted policy modifications to energy efficiency implementation plans. The APS
5 proposal would waive portions of the rule and create entirely new programs without so much as
6 a list of potential improvements and the cost-effectiveness of those improvements. This directly
7 counters the "status quo" posture the Commission has been following for so long.

8 While RUCO is open to some of the concepts APS puts forward, RUCO feels that it is
9 premature to grant unconditional waivers and enable new branches of programs. RUCO
10 encourages APS to come back to the Commission with a proposal that details program design,
11 costs, and expectations. RUCO imagines that this task should be relatively straightforward since
12 system efficiency improvements should be ongoing and planned as a normal course of
13 operating a utility business.

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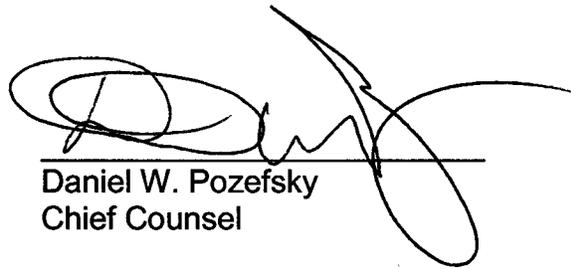
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1 RESPECTFULLY SUBMITTED this 7th day of March, 2014

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Daniel W. Pozefsky
Chief Counsel

10 AN ORIGINAL AND THIRTEEN COPIES
11 of the foregoing filed this 7th day of March,
12 2014 with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 W. Washington
16 Phoenix, AZ 85007

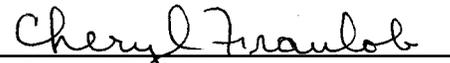
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18 mailed this 7th day of March, 2014 to:

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