



Shaping Tomorrow
Built Environment Today



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Thomas H. Phoenix, P. E., FASHRAE
President

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Reply to: ASHRAE Headquarters
1791 Tullie Circle NE

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

November 17, 2014

NOV 18 2014

Mr. Bob Stump, Chairman
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

ORIGINAL

DOCKETED BY

RE: Proposed Change to Arizona Energy Efficiency Requirements – Docket #E-0000XX-13-0214

Dear Chairman Stump:

ASHRAE would like to state its opposition to the proposed change of Arizona requirements for energy efficiency (Docket No. E-0000XX-13-0214). The energy-efficiency programs for the states' utilities, targeted by this proposed change, are projected to conserve 22 percent of electricity sales by 2020.

The need for greater energy efficiency is clear. In the United States, residential and commercial buildings account for approximately 40 percent of the total primary energy use, more than either transportation or industry. Specifically, heating, ventilation, air conditioning, and refrigeration (HVAC&R), and water heating are responsible for about 75 percent of residential and 54 percent of commercial building site energy use. They are responsible for 72 percent of the electricity consumption and 39 percent of the total U.S. CO₂ emissions.

It is ASHRAE's view that states should adopt policies that improve building energy efficiency through equipment standards and performance-oriented building codes. Code-adopted standards can save more energy than any other policy tools, and consensus standards (e.g., ANSI/ASHRAE/IES Standard 90.1) help ensure technical accuracy and economic feasibility.

ASHRAE also encourages states to adopt policies related to energy efficiency that support innovation, reduce market barriers, and include full environmental considerations. Such policies illustrate that government leads by the example of outstanding design, construction, and operation of its own buildings, whether owned or leased. Making proven technologies and practices mainstream is the key to win-win-win strategies for the owners, the economy and the environment.

Cost-effective energy efficiency is critical for the economy, the environment and energy security. Arizona's requirements, which were adopted unanimously by the Arizona Corporation Commission in 2010, are already having a positive effect on energy efficiency in the state. Revoking those standards would turn back the clock on the great progress Arizona has made over the past four years. Therefore, ASHRAE opposes these changes.

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 50,000 members worldwide

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ASHRAE – President Thomas H. Phoenix

focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

We look forward to working with you to amicably resolve these concerns. For additional info, please contact Dave Palty, ASHRAE Tucson Chapter Grassroots Government Activities Chair, by telephone at 480-352-4552 or by email at dpalty@outlook.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas H. Phoenix". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas H. Phoenix, P.E., FASHRAE
President

THP/mdt

Cc: James Scarborough, ASHRAE Manager of Grassroots Government Affairs
David Palty, ASHRAE – Tucson, Arizona Chapter Representative - GGA