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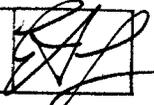
Arizona Corporation Commission
DOCKETED

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

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CORP COMMISSION
DOCKET CONTROL

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RE: Proposed Change to Arizona Energy Efficiency Requirements - Docket #E-00000XX-13-0214

Dear Chairman Stump:

I would like to state its opposition to the proposed change of Arizona requirements for energy efficiency (Docket No. E-00000XX-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.

In my personal opinion, cost effective energy efficiency is critical for the economy, the environment and energy security. My active personal participation with energy efficiency and utility DSM programs makes it easy for me to conclude that energy efficiency is proven to save money, emissions and water.

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.

Additionally, in my opinion, I think that active thinkers should consider the review of emissions and water when developing and evaluating long term energy efficiency plans that are cost effective for Arizona.

With the proposed EPA 111(d) rules that would reduce climate change-related carbon dioxide emissions, in which the EPA determined the **best system of emission reduction (BSER)** to be a combination of measures that can be grouped into four categories, or "building blocks" -1) power plant efficiency improvements, 2) redispatch (i.e., meeting demand with natural gas combined cycle plants instead of coal-fired plants), 3) nuclear and renewable energy generation, and 4) demand-side energy efficiency.

And as for water conservation, I will always remember the following factoid from a National Renewable Energy Laboratory (NREL) Technical Report that "in Arizona, for example, 7.85 gallons of water are lost to evaporation per kWh consumed."

Through end of year 2013, APS alone reported cumulative MWh savings from energy efficiency measures to be over 2,500,000 MWh. That is a lot of kWh and water.

However in water reuse, I also think it is very positive that at the Palo Verde Nuclear Generating Station, water treated at Arizona's largest wastewater sewage plant is piped 36 miles to a treatment plant and then into on-site reservoirs. From there, it feeds the plant's tertiary cooling loop that runs through condensers under the turbogenerator, through cooling towers, and back again, until it is super-concentrated and diverted to evaporation ponds.

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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. In Arizona, EIA's "Residential Electricity Consumption Per Capita 1980-2011" indicates that residential electricity consumption is growing faster than population in Arizona while it's 2011 per capita consumption of electricity(kWh) was 12% greater than the national average.

I encourage the Arizona Corporation Commission 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 Arizona owners, the economy and the environment.

In summary, I believe that energy efficiency should be part of the societal solution because it is adequately demonstrated, cost-effective, imposes minimal environmental costs, and reduces overall energy requirements. Moreover, emission reductions from energy efficiency can be enforceable, permanent, surplus, and quantifiable as those terms are defined by EPA. The ACC can draw on long-standing state, private sector, and federal methodologies for measuring and verifying emission reductions from end-use EE. And finally, it saves water.

Energy Efficiency is good for customers, good for the economy, good for utility systems and good for the environment which makes energy efficiency good for Arizona.

Finally, I do not understand why the Arizona Corporation Commission would eliminate Arizona's least expensive new resource in terms of \$/MWh costs.

Therefore, I opposes these changes as quantitative proof that the existing energy efficiency plan is working well for Arizona has been previously presented to the Arizona Corporation Commission.

Very truly yours,

Dave Palty