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BEFORE THE ARIZONA CORPORATION COMMISSION

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- TOM FORESE

2015 SEP -2 A 11: 14

AZ CORP COMMISSION  
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION  
FOR UNS ELECTRIC, INC. FOR  
APPROVAL OF ITS 2015 ENERGY  
EFFICIENCY IMPLEMENTATION PLAN.

DOCKET NO. E-04204A-14-0178

**SWEEP COMMENTS ON THE  
UNS ELECTRIC 2015-2016 ENERGY  
EFFICIENCY IMPLEMENTATION  
PLAN**

**COMMENTS OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT**

1 The Southwest Energy Efficiency Project (SWEEP) appreciates the opportunity to submit  
2 comments in response to the Recommended Opinion and Order filed by Staff on August 26,  
3 2015, regarding UNS Electric Inc.'s (UNSE) Application for Approval of its 2015-2016 Energy  
4 Efficiency (EE) Implementation Plan.

5  
6 SWEEP thanks Staff for its efforts to prepare the Recommended Order while simultaneously  
7 working on a suite of other applications and matters. SWEEP also recognizes the Company for  
8 proposing new program enhancements that will deliver significant benefits for Arizona and  
9 UNSE customers, including lower total customer costs and lower customer utility bills.

10  
11 **SWEEP supports Commission Approval of the Staff Recommended Opinion and Order,**  
12 **including the approval of UNSE's EE Plan and the new EE opportunities found cost**  
13 **effective by Staff.**

14 These new opportunities are cost effective; are in the public interest; and will deliver significant  
15 benefits. In addition, approval of the UNSE EE Plan will enable the Company to engage more  
16 customers and offer more ways for customers to save money on their electricity bills. *Notably,*  
17 *approval of the EE Plan and the new cost effective measures will NOT require an increase in*  
18 *UNSE's DSM Surcharge.*

19  
20 Finally, SWEEP understands that the Company does not anticipate meeting the Electric Energy  
21 Efficiency Standard goals in 2015 or 2016. However, SWEEP does not believe a waiver from the  
22 Standard for each of these two years is necessary because the Standard is based on cumulative  
23 energy savings. Instead, SWEEP recommends that the Commission acknowledge on the record  
24 that UNSE is not currently achieving the level of energy savings the Standard requires.

25  
26 Thank you for the opportunity to submit these comments.

Arizona Corporation Commission

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SEP 02 2015

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1 Respectfully submitted this 2<sup>nd</sup> day of September 2015 by:  
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6 Jeff Schlegel & Ellen Zuckerman  
7 Southwest Energy Efficiency Project  
8

9 ORIGINAL and thirteen (13) copies filed this 2<sup>nd</sup> day of September 2015, with:  
10

11 Docket Control  
12 ARIZONA CORPORATION COMMISSION  
13 1200 West Washington Street  
14 Phoenix, Arizona 85007