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2015 OCT 16 A 8:54

**BEFORE THE ARIZONA CORPORATION COMMISSION**

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7 SUSAN BITTER SMITH, Chairman  
8 BOB BURNS  
9 BOB STUMP  
10 DOUG LITTLE  
11 TOM FORESE

OCT 16 2015

DOCKETED BY

12 IN THE MATTER OF THE APPLICATION ) DOCKET NO. E-04204A-14-0178  
13 FOR UNS ELECTRIC, INC. FOR )  
14 APPROVAL OF ITS 2015 ENERGY ) **ACAA COMMENTS ON THE UNS ELECTRIC 2015-  
EFFICIENCY IMPLEMENTATION PLAN ) 2016 ENERGY EFFICIENCY IMPLEMENTATION  
PLAN**

16 Thank you for the opportunity to submit comments in response to the Recommended Opinion  
17 and Order regarding UNS Electric Inc.'s (UNSE) Application for Approval of its 2015-2016 Energy  
18 Efficiency Implementation plan.

20 Of the many measures offered in the implementation plan, weatherization is the most valuable  
21 for low-income customers. For many vulnerable community members, this is their only opportunity to  
22 experience the benefits of energy efficiency. Clients who receive weatherization have less difficulty  
23 paying their utility bills and state that they are much less likely to sacrifice purchasing food and  
24 prescriptions to pay their energy bills.<sup>1</sup> The energy burden, the percentage of household income  
25 required to pay energy costs, is five times higher for low-income households than it is for the average

28 <sup>1</sup> "Making Sense of Non-Energy Benefits: Results from the Weatherization Assistance Program," Bruce Tonn, PhD.  
[https://www.iea.org/media/workshops/2013/energyproviders/Session1\\_4\\_Tonn\\_CanadaIEANEBS.pdf](https://www.iea.org/media/workshops/2013/energyproviders/Session1_4_Tonn_CanadaIEANEBS.pdf)

1 population.<sup>2</sup> This creates a tremendous strain on the budgets of low-income community members,  
2 forcing them to make the incredibly difficult choices of whether they should put food on the table, gas in  
3 their car, or pay the electric bill.<sup>3</sup> To this end, weatherization is an invaluable tool helping families save  
4 hundreds of dollars per year and ensuring safe and healthy homes.<sup>4</sup>

5  
6 I commend the recommendation of Staff with regard to Unisource Electric's Low Income  
7 Weatherization program. I am heartened to see that UNSE believes that the program can expand, given  
8 its proposed budget increase; still, I believe maintaining the program funding at current levels will  
9 provide stability to the Community Action Agencies managing the program, allowing them to continue  
10 to serve their communities well. As we go forward, there are a few areas where the program could be  
11 improved where we will work with UNSE and the weatherization agencies to ensure the full expenditure  
12 of funds. We will also work to strengthen the program for customers in the future. One area in  
13 particular that would provide greater relief to customers is increasing the spending limit from \$3,000.00  
14 to \$4,000.00 per residence. By doing so, low-income families could receive a more complete suite of  
15 weatherization measures, delivering greater energy efficiency, comfort, and savings to the family. I  
16 appreciate the company's proposal to allow waivers to the funding limit on a case-by-case basis; this will  
17 be a solid foundation from which to evaluate an appropriate funding cap increase.

18  
19  
20 Additionally, I believe targeted outreach coordinated with UNSE to increase program visibility  
21 to ensure the program assists clients most in need could be extremely helpful. In the Energy Efficiency  
22 Implementation Plan proposal UNSE noted that it does not do any advertising or promotion for  
23

24  
25 <sup>2</sup> Tabulation based on EIA STEO October 2013, 2009 RECS, "ENERGY PRICES, ENERGY EXPENDITURES, ENERGY  
26 BURDENS & SAVINGS ESTIMATES" [http://www.nascsp.org/data/files/website\\_docs/events/2014-mid-winter/030414/3-energy-savings-calculations.pdf](http://www.nascsp.org/data/files/website_docs/events/2014-mid-winter/030414/3-energy-savings-calculations.pdf)

27 <sup>3</sup> **Food or Fuel: Calculating Elasticities To Understand "Heat or Eat" Behavior**, Murray, Anthony G., and Bradford  
28 F. Mills <http://www.ers.usda.gov/data-products/food-and-nutrition-assistance-research-database/ridge-project-summaries.aspx?type=2&summaryId=227>

<sup>4</sup> Eisenberg, Joel F. (2010) "**WEATHERIZATION ASSISTANCE PROGRAM TECHNICAL MEMORANDUM  
BACKGROUND DATA AND STATISTICS**" [http://weatherization.ornl.gov/pdfs/ORNL\\_TM-2010-66.pdf](http://weatherization.ornl.gov/pdfs/ORNL_TM-2010-66.pdf)

1 weatherization. Staff noted that the goal for completed homes exceeded the total homes weatherized  
2 recently; I believe UNSE could be an invaluable resource in providing outreach and community  
3 education to ensure low-income families are able to take full advantage of this program.  
4

5 Finally, I am glad to see that the DSM surcharge was not proposed to be increased; energy  
6 efficiency is a least-cost investment, and I'm glad that UNSE can continue to provide its energy efficiency  
7 implantation program without increasing costs, especially for those least able to afford it.

8 Thank you for the opportunity to submit these comments, and I encourage you to please  
9 consider low-income households when you deliberate upon this issue and support the staff  
10 recommendation.  
11

12 Respectfully submitted this 16<sup>th</sup> day of October 2015.

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15 \_\_\_\_\_  
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18 Arizona Community Action Association

19 ORIGINAL and thirteen (13) copies filed this 16<sup>th</sup> day of October 2015, with:

20 Docket Control  
21 ARIZONA CORPORATION COMMISSION  
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