

ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

Arizona Corporation Commission

DOCKETED

2016 JAN 29 P 4: 30

COMMISSIONERS

DOUG LITTLE, Interim Chairman  
BOB STUMP  
ROBERT BURNS  
TOM FORESE

JAN 29 2016

DOCKETED BY

AZ CORP COMMISSION  
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION )	DOCKET NO. G-01551A-15-0168
OF SOUTHWEST GAS CORPORATON )	
FOR APPROVAL OF AN ENERGY )	<b>COMMENTS OF THE ARIZONA</b>
EFFICIENCY AND RENEWABLE ENERGY )	<b>COMMUNITY ACTION ASSOCIATION</b>
RESOURCE TECHNOLOGY PORTFOLIO )	
IMPLEMENTATION PLAN )	

**COMMENTS OF THE ARIZONA COMMUNITY ACTION ASSOCIATION**

Arizona Community Action Association (ACAA) appreciates the opportunity to comment on Southwest Gas's (SWG) Energy Efficiency and Renewable Energy Resource Technology Portfolio Implementation Plan.

As an association working to alleviate and ultimately eradicate poverty, making customers' bills affordable through customer-sited resources is a priority for ACAA. The primary means by which low-income customers benefit from the Plan is through the Low-Income Energy Conservation (LIEC) program. The LIEC is comprised of two components: one to provide bill assistance to customers suffering through acute crises, and the weatherization component designed to make low-income housing safe, healthy, and efficient through upgrades to the building and appliances. The LIEC has had a remarkable impact, providing over \$600,000 of bill assistance to 4,067 households and over \$900,000 of weatherization improvements to 645 families.

1 More and more Arizona families struggle to make ends meet. Fifty-one percent of  
2 Arizona children are below 200% of the Federal Poverty Guideline, and 55% of children less  
3 than six years old are below 200% FPG.<sup>1</sup> As of October 2015, there were 1.5 unemployed job  
4 seekers per job opening, hovering above pre-recession levels.<sup>2</sup> Arizona has the seventh-highest  
5 rate of unemployment as of October 2015.<sup>3</sup> Moreover, Arizona has the second-highest rate of  
6 underemployment in the United States.<sup>4</sup> Underemployed workers are involuntary part-time  
7 employees for economic reasons. This often takes the form of engineers working as sales clerks,  
8 stock traders delivering pizzas – whatever they have to do to keep their heads above water. The  
9 perseverance of these individuals is admirable as many have been able to keep their income  
10 above 150% of the poverty line but are still very much struggling to get by.  
11

12  
13 ACAA fully supports expanding the eligibility of the LIEC to 200% of the Federal  
14 Poverty Guideline in order to serve the growing number of working poor. More customers who  
15 receive weatherization services are more likely to be able to pay their gas bill in full and less  
16 likely to not fill prescriptions or buy food in order to pay energy bills.<sup>5</sup> Children in families that  
17 receive bill assistance are less likely to be at risk for growth problems and less likely to be  
18 hospitalized when seeking care for acute medical problems than children whose families who  
19 have not received assistance.<sup>6</sup>  
20  
21  
22  
23

24 <sup>1</sup> American Fact Finder table B17024 ([factfinder2.census.gov/](http://factfinder2.census.gov/)).

25 <sup>2</sup> EPI analysis of Bureau of Labor Statistics Job Openings and Labor Turnover Survey and Current Population Survey.  
<http://stateofworkingamerica.org/charts/job-seekers-ratio-total/>

26 <sup>3</sup> <http://www.bls.gov/news.release/laus.t03.htm> Civilian labor force and unemployment by state and selected  
area, seasonally adjusted

27 <sup>4</sup> <http://www.bls.gov/lau/stalt.htm> Alternative measures of labor underutilization by state, fourth quarter of 2014  
through third quarter of 2015 averages (percent)

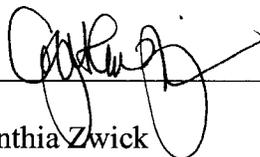
28 <sup>5</sup> [https://www.iea.org/media/workshops/2013/energyproviders/Session1\\_4\\_Tonn\\_CanadaIENEBS.pdf](https://www.iea.org/media/workshops/2013/energyproviders/Session1_4_Tonn_CanadaIENEBS.pdf)

<sup>6</sup> [http://www.childrenshealthwatch.org/upload/resource/energy\\_brief\\_feb11.pdf](http://www.childrenshealthwatch.org/upload/resource/energy_brief_feb11.pdf)

1 ACAA also supports Southwest Gas's proposal to increase weatherization eligibility  
2 because doing so greatly increases program efficiency and decreases the administrative burden of  
3 the weatherization program. In order to provide the best possible weatherization service to their  
4 clients, agencies will often combine funds from federal programs, utilities, and other sources.  
5 Currently, the Federal Weatherization Assistance Program and LIHEAP maintain an eligibility  
6 of 200% of the Federal Poverty Guideline. Similarly, the major electric utilities operating in the  
7 same territory as Southwest Gas – Arizona Public Service, Tucson Electric Power, and Salt River  
8 Project – also set eligibility at 200% FPG. Aligning the eligibility of the weatherization program  
9 will allow for more efficient management and the removal of additional hurdles ensuring that  
10 low-income and working poor families can receive this valuable assistance.  
11

12  
13 In conclusion, I want to thank Southwest Gas for their proposal to increase the eligibility  
14 of the LIEC program, and I strongly encourage the members of the Commission to approve their  
15 proposal.  
16

17 RESPECTFULLY Submitted this 29<sup>th</sup> day of January, 2016.

18  
19   
20 \_\_\_\_\_  
21 Cynthia Zwick  
22 Executive Director  
23 Arizona Community Action Association

24 Original and 13 copies filed  
25 This 29<sup>th</sup> day of January, 2016 with:

26 Docket Control  
27 Arizona Corporation Commission  
28 1200 West Washington St.  
Phoenix, Arizona 85007

1 Copies mailed or emailed  
2 this 29<sup>th</sup> day of January, 2016 to:

3  
4 Janice Alward  
5 1200 W. Washington  
6 Phoenix, Arizona 85007

7 Thomas Broderick  
8 1200 W. Washington St.  
9 Phoenix, Arizona 85007

10 Dwight Nodes  
11 Arizona Corporation Commission  
12 1200 W. Washington  
13 Phoenix, Arizona 85007-2927

Matt Derr  
Southwest Gas Corporation  
1600 Northern Avenue  
Phoenix, Arizona 85020

Catherine Mazzeo  
5241 Spring Mountain Road  
Las Vegas, Nevada 89150

Southwest Gas Corporation  
5241 Spring Mountain Road  
P.O. Box 98510  
Las Vegas, Nevada 89193

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28