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Intermountain Centers for Human Development

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April 4, 2016

Arizona Corporation Commission

RE: UNS Electric Rate Case Docket #E-04204A-15-0142

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Dear Chairman Little and Members of the Arizona Corporation Commission:

Please accept these comments on behalf of Intermountain Centers for Human Development, a not-for-profit human services agency serving approximately 2,000 persons and families with mental health needs, as well as individuals coping with developmental disabilities. Most of the individuals served by this organization have low incomes, or come from low income families, and struggle with cost-of-living issues. Furthermore, the people that we serve are encouraged to ration their energy costs and seek sources of energy that have the least impact upon environmental resources.

We are concerned that the UNS Electric proposed major changes to the rate structure will have a negative impact on the options that low-income customers have to lower the cost of their energy bills. Changing the mandatory demand charges from \$10 to \$15 or \$20 will disparately affect customers who use less energy. Higher fixed costs will make it unlikely they would invest in alternative sources of energy including solar generation. We are concerned that if UNS Electric is granted this rate increase, APS and Tucson Electric Power ratepayers will soon see similar mandatory and increased fees.

Please be forward thinking regarding our energy future and approve rates that are fair to people of all incomes who seek the flexibility to use clean sources of energy as well as to conserve energy though efficiency measures.

Sincerely,

David K. Giles, Ph.D.
President and CEO

Arizona Corporation Commission

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