

BEFORE THE ARIZONA CORPORATION COMMISSION

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2	SUSAN BITTER SMITH Chairman		
3	BOB STUMP Arizona Corporation Commission		
4	BOB BURNS DOCKETED		
5	Commissioner DOUG LITTLE OCT 2 7 2015		
6	Commissioner TOM FORESE DOCKETED BY		
	Commissioner		
7	IN THE MATTER OF THE)		
8	APPLICATION OF UNS ELECTRIC, INC. FOR APPROVAL OF ITS 2015 ENERGY DOCKET NO. E-04204A-14-0178 DECISION NO		
9	EFFICIENCY IMPLEMENTATION)		
10	PLAN.) ORDER		
11	Onen Mastina		
12	Open Meeting September 8 and 9, 2015		
13	Phoenix, Arizona		
14	BY THE COMMISSION:		
15	<u>FINDINGS OF FACT</u>		
16	1. UNS Electric, Inc. ("UNS Electric" or "Company") is certificated to provide electric		
17	service as a public service corporation in the state of Arizona.		
18	INTRODUCTION		
19	2. On June 2, 2014, UNS Electric filed an application with the Arizona Corporation		
20	Commission ("Commission") requesting approval of its 2015 Energy Efficiency Implementation Plan		
21	("2015 EE Plan"). On June 1, 2015, UNS Electric filed a letter indicating the 2015 EE Plan		
22	incorporated the new measures the Company was seeking approval to implement. The letter		
23	requested the pending 2015 EE Plan be considered as the combined 2015/2016 EE Plan.		
24	3. In addition, UNS Electric has requested a waiver from the 2015/2016 Energy		
25	Efficiency Standard ("EE Standard") in accordance with A.A.C. R14-2-2419(B).		
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EE PLAN OVERVIEW

- 4. UNS Electric's current Energy Efficiency Plan ("EE Plan") and its Demand Side Management ("DSM") Surcharge were approved by the Commission in Decision No. 74599, dated July 30, 2014. UNS Electric's current EE Plan was approved at a budget level of \$4,790,512. The current DSM Surcharge was set at \$0.001500 per kWh.
- 5. The Company's proposed 2015/2016 EE Plan filed June 2, 2014 and June 1, 2015, sought to modify existing programs by adding new measures. The table below details those new measures and also details any modifications or terminations that UNS Electric has communicated to Staff. The Appliance Recycling, Shade Trees, Residential New Construction, Low Income Weatherization ("LIW"), Bid for Efficiency, Retro-Commissioning, Commercial & Industrial Demand Response (Direct Load Control), Behavioral Comprehensive Program, Consumer Education and Outreach, and Energy Codes and Standards Enhancement programs are not being modified beyond changes to the budget with this 2015/2016 EE Plan filing.
- 6. In addition, the Home Energy Reports Program was discontinued in Decision No. 74599, dated July 30, 2014 at the request of UNS Electric as the Company had found the program to no longer be cost-effective. The approved budget for the Home Energy Reports Program for 2014 was \$50,000 to pay expenses needed to terminate the program. UNS Electric has indicated that the program has been terminated and has not requested budget dollars for this program in the 2015/2016 EE Plan.

Proposed Energy Efficiency Program Modifications, Additions, or Terminations

Residential				
Efficient Products Program				
Residential 2x Incandescent	Add a measure providing a rebate for 2x Incandescent light bulbs.			
Residential LED Home Lighting	Add a measure providing a rebate for LED Home Lighting.			
ENERGY STAR® Central Air Conditioner/Heat Pump	Add a measure offering a rebate for installing a central air conditioner/heat pump.			
ENERGY STAR® Clothes Washer	Add a measure providing a rebate for purchasing an energy efficient clothes washer.			

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ENERGY STAR® Dishwasher	Add a measure providing a rebate for purchasing an energy efficient dishwasher.
ENERGY STAR® Refrigerator	Add a measure providing a rebate for purchasing an energy efficient refrigerator.
ENERGY STAR® Room Air Conditioner	Add a measure providing a rebate for purchasing an energy efficient room air conditioner.
Variable Speed Pool Pump	Reinstate the measure offering a rebate for installing a variable speed pool pump.
Existing Homes Program	
Air Sealing and Attic Insulation	Discontinue offering an incentive for air sealing and attic insulation.
Duct Test and Repair ("DTR")	Discontinue offering one incentive for all duct test and repair. Replace with two new measures separating the Duct Test and Repair measure into two measures/tiers based on the reduction in leakage from the original condition of the house.
Early Retirement Heating Ventilation and Air Conditioning with Quality Installation and Duct Sealing ("ER HVAC with QI & Duct Sealing")	Discontinue offering one incentive for all ER HVAC with QI & Duct Sealing. Replace with three new measures separating the ER HVAC with QI & Duct Sealing measure into three measures/tiers based on the reduction in leakage from the original condition of the house. Three replacement measures are: ER HVAC with QI, ER HVAC with QI Tier 1 DTR and ER HVAC with QI Tier 2 DTR.
Tune Up – Advanced Tune Up	Add a measure providing a rebate for an air conditioner or heat pump tune up.
Tune Up – Western Cooling Control Stand Alone ("Tune Up WCC Stand Alone")	Add a measure providing a rebate for installation of a WCC on existing air conditioners or heat pumps.
Tune Up – Brushless Permanent Magnet Motor/Electronically Communicated Motor ("Tune Up BPM/ECM Motor")	Add a measure providing a rebate for an air conditioner or heat pump tune up with a BPM motor or ECM.
HVAC/QI	Reinstate a measure for a rebate for the replacement on burn-out of an inefficient air conditioner or heat pump with a high efficiency air conditioner or heat pump with quality install measures and prescriptive duct repair providing the minimum reduction of duct leakage from the original condition of the house.
HVAC/QI Tier 1 DTR	Reinstate a measure for a rebate for the

1 2 3		replacement on burn-out of an inefficient air conditioner or heat pump with a high efficiency air conditioner or heat pump with quality install measures and the Tier 1 reduction of duct leakage from the original condition of the house.
4 5 6 7	HVAC/QI Tier 2 DTR	• Reinstate a measure for a rebate for the replacement on burn-out of an inefficient air conditioner or heat pump with a high efficiency air conditioner or heat pump with quality install measures and the Tier 2 reduction of duct leakage from the original condition of the house.
8	Multi-Family Program	
9 10	Tune Up – Advanced Tune Up	Add a measure providing a rebate for an air conditioner or heat pump tune up.
11 12	Tune Up – WCC Stand Alone	 Add a measure providing a rebate for the installation of a WCC on an existing air conditioner or heat pump.
13	Tune Up – BPM/ECM Motor	Add a measure providing a rebate for an air conditioner or heat pump tune up with a BPM motor or ECM.
15 16	DTR Tier 1 and Tier 2	Add two new measures separating the Duct Test and Repair measure into tiers based on the reduction in leakage from the original condition of the multifamily unit.
17		ial & Industrial
18	C&I Facilities/Schools	
19 20	High Efficiency SEER Packaged and Split AC's	 Discontinue the existing three (14-15-16 SEER) Split AC's measures and replace with one new measure using weighted average values for a High Efficiency SEER Packaged and Split AC.
21 22	High Efficiency SEER Packaged and Split HP's	Discontinue the existing three (14-15-16 SEER) Split HP's measures and replace with one new measure using weighted average values for a High Efficiency SEER Packaged and Split HP.
23	LED Indoor Lighting	Add a measure offering an incentive for installing LED Indoor Lighting.
25	LED Outdoor Lighting	Add a measure offering an incentive for installing LED Outdoor Lighting.
26 27	Interior High-Bay LED Lighting	Add a measure offering an incentive for installing interior high-bay LED lighting.
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Decision No. ____

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Add a measure offering an incentive for T-8 or T-12 to LED Tubes replacement of T-8 or T-12 lamps with LED tubes. Add a measure offering an incentive for Exterior HID to LED replacement of an exterior high intensity discharge lamp with an LED. Add a measure offering an incentive for Canopy LED installing a canopy LED. Add a measure offering an incentive for Computer Power Monitoring System installing a computer power monitoring system. Add a measure offering an incentive for Refrigerated Case LED installing a refrigerated case LED. Add a measure offering an incentive for Energy Management Systems HVAC Delivery installing an energy management system for ("EMS HVAC Delivery") thermostats or pneumatic controls. Add a measure offering an incentive for **EMS Lighting** installing an energy management system to control lighting operations. Add a measure offering an incentive which promotes the quality installation of HVAC HVAC System Test and Repair systems to assure systems operate at rated efficiency. Add a measure offering an incentive to install Strip Curtains strip curtains to doors in walk-in refrigerators and freezers

PROPOSED PROGRAM CHANGES

A. <u>Efficient Products Program</u>

Current Program

7. The Efficient Products Program promotes the purchase of energy efficient retail products through in-store buy down promotions and the promotion of EE products in general.

Proposed Changes

8. UNS Electric has requested to continue the current Efficient Products Program and to add seven new measures (LED Home Lighting, Energy Star Central Air Conditioner, Energy Star Clothes Washer, Energy Star Dishwasher, Energy Star Refrigerator, Energy Star Room Air

Conditioner, and 2x Incandescents). UNS Electric also requested that Staff re-evaluate one measure which had been discontinued in a previous decision due to a low benefit-cost ratio: Variable Speed Pool Pump. The new measures would offer residential customers additional opportunities to reduce energy consumption.

Proposed Budget

9. The 2015/2016 proposed budget for the Efficient Products Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	Current	UNS Electric Proposed	Staff Proposed
Incentives	\$327,030	\$449,725	\$447,745
Non-Incentive Cost	\$507,697	\$440,787	\$440,787
Total Program Cost	\$834,727	\$890,512	\$888,532

10. The last approved budget for this program, approved in Decision No. 74599, was \$834,727 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$1,032,476. The proposed budget for this program for 2015/2016, as can be seen above, is \$890,512 which represents an increase of \$55,785 over the 2014 budget or roughly a 7 percent increase.

Recommendations

11. Staff completed a benefit-cost analysis on the seven proposed new measures and one discontinued measure that UNS Electric would like to offer again. The cost-effectiveness ratios for these eight measures can be seen in the table below. Six of the seven proposed new measures have a benefit-cost ratio of 1.0 or above. The Variable Speed Pool Pump also has a benefit-cost ratio equal to 1.0. The 2x Incandescent has a benefit-cost ratio of 0.93. Staff has recommended approval of six of the new measures and the re-implementation of the Variable Speed Pool Pump measure. Staff has not recommended approval of the offering of the 2x Incandescent measure. Given the increase in the number of available measures and the actual expenses for 2014, Staff has recommended an increase in

Ratio

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the Efficient Products Program budget to \$888,532, if the Commission approves all the measures with a benefit-cost ratio of at least 1.0.

Proposed/Re-Implemented

Energy Star Clothes Washer
Energy Star Dishwasher

Energy Star Refrigerator

Variable Speed Pool Pump

2x Incandescent

Energy Star Central Air Conditioner

Energy Star Room Air Conditioner

LED Home Lighting

Measure

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B. Residential Appliance Recycling Program

Current Program

12. This program is designed to remove and recycle inefficient yet functioning refrigerators and freezers.

Proposed Changes

13. The Company has not proposed any changes to this program.

Proposed Budget

14. The 2015/2016 proposed budget for the Residential Appliance Recycling Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

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	2014 (Current)	2015/2016 (Proposed)
Incentives	\$39,000	\$20,000
Non-Incentive Cost	\$94,513	\$69,765
Total Program Cost	\$133,513	\$89,765

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15. The last approved budget for this program, approved in Decision No. 74599, was \$133,513 for 2014. According to the DSM Program Report filed by the Company on February 27,

2015, the actual expenses incurred in 2014 for this program were \$50,294. The proposed budget for this program for 2015/2016 as can be seen above is \$89,765 which represents a decrease of \$43,748 from the 2014 budget or roughly a 33 percent decrease. The Company is requesting a decrease to the budget as participation has been lower than expected but expects the program to still have participation as this program was recently approved for Tucson Electric Power ("TEP") and some economies of scale may be realized.

Recommendations

16. Staff has recommended continuation of the Residential Appliance Recycling Program along with approval of the decrease in the budget dollars to \$89,765.

C. Residential New Construction Program

Current Program

17. This is an existing program that has been ongoing since 2008. The goal of the program is to award incentives to more energy efficient homes. To qualify, new homes are required to meet the ENERGY STAR version 3 standards which require a Home Energy Rating System ("HERS") score of ≤73.

Proposed Changes

18. The Company has not proposed any changes to this program.

Proposed Budget

19. The 2015/2016 proposed budget for the Residential New Construction Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	2014 (Current)	2015/2016 (Proposed)
Incentives	\$56,000	\$80,000
Non-Incentive Cost	\$42,342	\$202,618
Total Program Cost	\$98,342	\$282,618

20. The last approved budget for this program, approved in Decision No. 74599, was \$98,342 for 2014. According to the DSM Program Report filed by the Company on February 27,

2015, the actual expenses incurred in 2014 for this program were \$160,468. The proposed budget for this program for 2015/2016 as can be seen above is \$282,618 which represents an increase of \$184,276 from the 2014 budget or roughly a 187 percent increase. The Company is requesting an increase to the budget as participation levels have been higher than anticipated.

Recommendations

- 21. Staff has recommended continuation of the Residential New Construction program along with approval of the increase in the budget dollars to \$282,618.
- D. Existing Homes and Audit Direct Install Program

9 | Current Program

22. This program is designed to encourage homeowners to increase the energy efficiency of their homes. UNS Electric has proposed several new measures, a redesign of two existing measures, a discontinuance of one measure, and a re-evaluation of three previously discontinued measures.

Proposed Changes

- 23. UNS Electric has proposed to discontinue the Air Sealing and Attic Insulation Measure. The Company is also proposing to discontinue offering the DTR measure and instead offer the DTR Tier 1 and DTR Tier 2 measures. In addition, UNS Electric is proposing to discontinue offering the ER HVAC with QI & Duct Sealing measure and instead offer the ER HVAC with QI, ER HVAC QI Tier 1 DTR, and ER HVAC QI Tier 2 measures.
- 24. The new measures that UNS Electric is proposing include: Tune Up-Advanced Tune Up, Tune Up-WCC Stand Alone, and Tune Up-BPM/ECM Motor. The Company has also requested a re-evaluation of the benefit-cost ratio for HVAC QI, HVAC QI Tier 1 DTR and HVAC QI Tier 2 measures that were previously discontinued.

Proposed Budget

25. The 2015/2016 proposed budget for the Existing Homes and Audit Direct Install is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

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	Current	UNS Electric Proposed	Staff Proposed
Incentives	\$399,125	\$910,372	\$880,372
Non-Incentive Cost	\$473,864	\$1,239,112	\$1,239,112
Total Program Cost	\$872,989	\$2,149,484	\$2,119,484

26. The last approved budget for this program, approved in Decision No. 74599, was \$872,989 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$625,964. The proposed budget for this program for 2015/2016 as can be seen above is \$2,149,484 which represents an increase of \$1,276,495 from the 2014 budget or roughly a 146 percent increase.

Recommendations

- 27. Staff completed a benefit-cost analysis on the three new measures, the three previously discontinued measures, and the five measures that were part of the redesign of the two existing measures. The benefit-cost ratios can be seen in the table below. All measures were found to have a benefit-cost ratio greater than 1.0 with the exception of Tune Up-BPM/ECM Motor with a benefit-cost ratio of 0.78 and HVAC QI Tier 1 DTR with a benefit-cost ratio of 0.98. Staff recognizes that the HVAC QI Tier 1 DTR measure would reach a ratio of 1.0 if environmental benefits were monetized.
- 28. Staff has recommended approval of all of the proposed new measures, re-evaluated measures, and redesigned measures with the exception of the Tune Up-BPM/ECM Motor measure which does not meet the benefit-cost analysis requirement. With the implementation of new measures, Staff has recommended the budget be increased to \$2,119,484 taking out the incentive dollars in the budget for the Tune Up-BPM/ECM Motor measure.

Proposed/Re-Implemented Measure	Ratio
DTR Tier 1	1.18
DTR Tier 2	2.25
ER HVAC with QI	1.20
ER HVAC QI Tier 1 DTR	1.24
ER HVAC QI Tier 2 DTR	1.88
Tune Up-Advanced Tune Up	1.27
Tune Up-WCC Stand Alone	1.83

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Tune Up-BPM/ECM Motor	0.78
HVAC QI	1.01
HVAC QI Tier 1 DTR	0.98
HVAC QI Tier 2 DTR	1.77

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E. Shade Tree Program

Current Program

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families allowing them to purchase two desert-adapted, five-gallon trees per year which must be planted on the south, west, or east side of the home. Qualifying tree purchases will result in a \$15.00 credit per tree on their electric bill.

This is an existing program targeted to residential customers including low-income

Proposed Changes

30. The Company has not proposed any changes to this program.

Proposed Budget

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31. The 2015/2016 proposed budget for the Shade Tree Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

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	2014 (Current)	2015/2016 (Proposed)
Incentives	\$19,800	\$25,500
Non-Incentive Cost	\$14,300	\$9,843
Total Program Cost	\$34.100	\$35.343

\$34,100 for 2014. According to the DSM Program Report filed by the Company on February 27,

2015, the actual expenses incurred in 2014 for this program were \$23,678. The proposed budget for

this program for 2015/2016 as can be seen above is \$35,343 which represents an increase of \$1,243

from the 2014 budget or roughly a 4 percent increase. The Company has adjusted the budget to

reflect more participation and less non-incentive costs incurred.

The last approved budget for this program, approved in Decision No. 74599, was

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	75297
Decision No.	

Recommendations

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of the increase in the budget dollars to \$35,343.

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F. Residential LIW Program

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Current Program

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34. This program is designed to improve the energy efficiency of homes for customers whose income falls within the defined federal poverty guidelines.

Staff has recommended continuation of the Shade Tree Program along with approval

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Proposed Changes

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35. The Company has not proposed any changes to this program.

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Proposed Budget

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36. The 2015/2016 proposed budget for the Residential LIW Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

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	C	UNS Electric	Staff
	Current	Proposed	Proposed
Incentives	\$324,000	\$375,000	\$324,000
Non-Incentive Cost	\$27,817	\$46,485	\$27,817
Total Program Cost	\$351,817	\$421,485	\$351,817

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37. The last approved budget for this program, approved in Decision No. 74599, was \$351,817 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$221,194. The proposed budget for this program for 2014 as can be seen above is \$421,485 which represents an increase of \$69,668 from

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the 2014 budget or roughly a 20 percent increase.

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Recommendations

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38. The UNS Electric proposed budget for the LIW Program incorporates an incentive to weatherize 150 homes compared to the budgeted 140 homes the previous year. While Staff is in agreement that allowing for a greater number of homes being weatherized is advantageous to the

residential customers, Staff also recognizes that UNS Electric reported the completed weatherizing of only 99 households in 2013 and 82 households in 2014. Staff has recommended continuation of the Residential LIW Program at the currently approved budget level of \$351,817.

G. Residential Multi-Family Program

Current Program

39. This program is designed to promote energy efficiency in the residential multi-family sector, on properties with five or more units.

Proposed Changes

40. The Company has proposed five new measures to be added to this program: Tune Up-Advanced Tune Up, Tune Up-WCC Stand Alone, Tune Up-BPM/ECM Motor, and DTR Tier 1 and DTR Tier 2.

Proposed Budget

41. The 2015/2016 proposed budget for the Residential Multi-Family Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	Current	UNS Electric Proposed	Staff Proposed
Incentives	\$13,567	\$133,219	\$117,469
Non-Incentive Cost	\$28,379	\$149,461	\$149,461
Total Program Cost	\$41,946	\$282,680	\$266,930

42. The last approved budget for this program, approved in Decision No. 74599, was \$41,946 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$12,895. The proposed budget for this program for 2015/2016 as can be seen above is \$282,680 which represents an increase of \$240,734 from the 2014 budget or roughly a 574 percent increase.

Decision No. __75297

Recommendations

H. C&I/Schools Facilities

Current Program

43. Staff completed a benefit-cost analysis on the four new measures. The benefit-cost ratios can be seen in the table below. All measures were found to have a benefit-cost ratio greater than 1.0 with the exception of Tune Up-BPM/ECM Motor with a benefit-cost ratio of 0.75.

44. Staff has recommended approval of all of the proposed new measures with the exception of the Tune Up-BPM/ECM Motor measure which does not meet the benefit-cost analysis requirement. With the implementation of new measures, Staff has recommended the budget be increased to \$266,930 taking out the incentive dollars in the budget for the Tune Up-BPM/ECM Motor measure.

Proposed Measure	Ratio
Tune Up-Advanced Tune Up	1.31
Tune Up-WCC Stand Alone	1.99
Tune Up-BPM/ECM Motor	0.75
DTR Tier 1	2.01
DTR Tier 2	2.01

45. In Decision No. 74262, the Schools Facilities program was combined with the C&I Facilities program. UNS Electric has requested budget approval to continue this combined program. The purpose of this program is to provide incentives for small business customers (including schools) to install high-efficiency equipment at their facilities and encourage contractors to promote the program.

Proposed Changes

46. UNS Electric has requested to add 14 new measures including: LED Indoor Lighting, LED Outdoor Lighting, Interior High-Bay LED Lighting, T-8 to T-12 to LED Tubes, Exterior HID to LED, Canopy LED, Computer Power Monitoring System, Refrigerated Case LED, EMS HVAC Delivery, EMS Lighting, HVAC System Test and Repair and Strip Curtains. In addition to these 12

new measures, UNS Electric is proposing to discontinue the current six AC/HP measures which vary by SEER level and offer only two new measures with combined SEER levels: a measure for High Efficiency SEER Packaged and Split AC's and a measure for High Efficiency SEER Packaged and Split HP's. The new measures would offer non-residential customers additional opportunities to reduce their energy consumption.

Proposed Budget

47. The 2015/2016 proposed budget for the C&I/Schools Facilities program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	C	UNS Electric	Staff
	Current	Proposed	Proposed
Incentives	\$484,685	\$443,536	\$443,511
Non-Incentive Cost	\$410,011	\$467,693	\$467,693
Total Program Cost	\$894,696	\$911,229	\$911,204

48. The last approved budget for this program, approved in Decision No. 74599, was \$894,696 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$418,107. The proposed budget for this program for 2015/2016 as can be seen above is \$911,229 which represents a slight increase of \$16,533 from the 2014 budget or roughly a 2 percent increase. The increase in budget dollars for 2015/2016 despite the lower actual expenses in 2014 can be attributed to changes UNS Electric is implementing in 2015 including an expanded outreach model designed to better educate business customers on the availability of the program and also a designated Customer Relationship Manager who will be engaged in Mohave County to solicit further enrollment and participation.

Recommendations

49. Staff completed a benefit-cost analysis on the 14 proposed new measures that UNS Electric would like to offer. The cost-effectiveness ratios for these 14 measures can be seen in the table below.

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All of the proposed new measures have a benefit-cost ratio of 1.0 or above except for 50. EMS Lighting which has a benefit-cost ratio of 0.71, LED Outdoor Lighting with a benefit-cost ratio of 0.97 and Interior High-Bay LED Lighting also with a benefit-cost ratio of 0.97. Staff has recommended approval of the 11 new measures with a benefit-cost ratio at or above one. Staff also has recommended approval of the two measures with a benefit-cost ratio of 0.97 as Staff recognizes there are environmental benefits which have not been monetized and incorporated into Staff's benefit-cost ratio which may lead to a benefit-cost ratio at or above 1.0. Staff has not recommended approval of the offering of the EMS Lighting measure.

Given the increase in the number of available measures and the changes that UNS 51. Electric has made to the program for 2015 and 2016, Staff has recommended an increase in the C&I/Schools Facilities Program budget to \$911,204, if the Commission approves all the measures with a benefit-cost ratio of at least 1.0 and LED Outdoor Lighting and Interior High-Bay LED Lighting.

Measure	Ratio
LED Indoor Lighting	1.19
LED Outdoor Lighting	0.97
Interior High-Bay LED Lighting	0.97
T-8 or T-12 to LED Tubes	1.01
Exterior HID to LED	1.49
Canopy LED	1.32
Computer Power Monitoring System	1.72
Refrigerated Case LED	1.52
EMS HVAC Delivery	1.02
EMS Lighting	0.71
HVAC System Test and Repair	1.60
Strip Curtains	2.65
High Efficiency SEER Packaged and Split AC's	1.14
High Efficiency SEER Packaged and Split HP's	1.88

Decision No. 70524, dated September 30, 2008, established a \$50,000 annual incentive 52. cap for Large Power Service ("LPS") customers and a \$10,000 incentive cap for all other customers participating in the C&I Schools/Facilities Program. The same Decision also limited the customer

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participation for LPS customers to two per year. UNS Electric has requested these incentive caps and limit on the number of LPS customers be removed as the Company has found the caps to be prohibitive to customers following through with energy efficiency upgrades. UNS Electric proposes the incentives be structured in such a way that a customer incentive is not more than 20 percent of the incentive dollars assigned to the entire C&I Schools/Facilities Program.

53. Staff's concern with making changes to the incentive caps and limit on the number of LPS customers is that the caps are designed to insure that a few large UNS Electric customers do not consume a disproportionate amount of the available incentives. At the same time, the incentives are not meant to prohibit commercial and industrial customers from pursuing energy efficiency enhancements. Staff has recommended adjusting the caps for all customers in the C&I Schools/Facilities Program to 20 percent of the incentive budget dollars detailed above and removing the two customer per year limit but also has recommended adding the requirement that the 2015 and 2016 Annual Demand Side Management Reports detail the exact amount of incentive dollars paid to each customer during that calendar year so Staff is able to verify that not one customer received a disproportionate amount of the available incentive dollars.

Bid for Efficiency Program

Current Program

54. This program is designed so customers or project sponsors can propose their own energy efficiency projects and then bid competitively for incentives within Program guidelines.

Proposed Changes

55. The Company has not proposed any changes to this program.

Proposed Budget

56. The 2015/2016 proposed budget for the Bid for Efficiency Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	2014	2015/2016
	(Current)	(Proposed)
Incentives	\$240,000	\$200,000

Decision No. __75297

Non-Incentive Cost	\$83,582	\$92,005
Total Program Cost	\$323,582	\$292,005

57. The last approved budget for this program, approved in Decision No. 74599, was \$323,582 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$51,530. The proposed budget for this program for 2015/2016 as can be seen above is \$292,005 which represents a decrease of \$31,577 from the 2014 budget or roughly a 10 percent decrease.

Recommendations

58. Given the actual expenses incurred for 2014 were less than budgeted, Staff has recommended continuation of the Bid for Efficiency Program at the decreased level proposed by UNS Electric. UNS Electric is implementing in 2015 an expanded outreach model designed to better educate business customers on the availability of the program and also a designated Customer Relationship Manager who will be engaged in Mohave County to solicit further enrollment and participation.

J. Retro-Commissioning Program

Current Program

59. The purpose of this program is to identify deficiencies in existing facilities and make necessary adjustments to produce energy savings and other benefits, such as improved occupant comfort..

Proposed Changes

60. There was no participation in this program in 2014. UNS Electric's initial delivery model for this program included the same program being implemented for TEP. A Retro-Commissioning Program was approved for TEP in Decision No. 74885 dated December 31, 2014. UNS Electric will seek economies of scale with TEP in gaining participation in this program going forward.

Proposed Budget

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61. The 2015/2016 proposed budget for the Retro-Commissioning Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	2014 (Current)	2015/2016 (Proposed)
Incentives	\$44,000	\$154,000
Non-Incentive Cost	\$78,116	\$51,815
Total Program Cost	\$122,116	\$205,815

62. The last approved budget for this program, approved in Decision No. 74599, was \$122,116 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$34,584. The proposed budget for this program for 2015/2016 as can be seen above is \$205,815 which represents an increase of \$83,699 from the 2014 budget or roughly a 69 percent increase.

Recommendations 63. Given the recent approval of this same program for TEP and possible economies of

scale in the implementation of this program, Staff has recommended continuation of the Retro-

Commissioning Program along with approval of the increase in the budget dollars to \$205,815.

K. **C&I Demand Response**

Current Program

64. The purpose of this program is to manage peak demand and mitigate system

emergencies through a commercial and industrial load curtailment program. UNS Electric has

requested budget approval to continue this program.

Proposed Changes

65. The Company has not proposed any changes to this program.

Proposed Budget

66. The 2015/2016 proposed budget for the C&I Demand Response program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	2014 (Current)	2015/2016 (Proposed)
Incentives	\$0	\$0
Non-Incentive Cost	\$388,544	\$374,850
Total Program Cost	\$388,544	\$374,850

57. The last approved budget for this program, approved in Decision No. 74599, was \$388,544 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$189,311. The proposed budget for this program for 2015/2016 as can be seen above is \$374,850 which represents a slight decrease of \$13,694 from the 2014 budget or roughly a 4 percent decrease. UNS Electric anticipates continuing to actively recruit participants in this program in 2015 and 2016.

Recommendations

68. Staff has recommended continuation of the C&I Demand Response program along with approval of the decrease in the budget dollars to \$374,850 to allow the Company an adequate amount of time and funding to get this program fully functioning.

L. <u>Behavioral Comprehensive Program</u>

Current Program

69. The purpose of this program is to educate residential customers on how changes in behavior, including purchasing decisions, can improve energy efficiency. This program consists of four subprograms: Direct Canvassing, K-12 Education, Community Education, and CFL Promotions.

Proposed Changes

70. The Company has not proposed any changes to this program.

Decision No. _____

Proposed Budget

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71. The 2015/2016 proposed budget for the Behavioral Comprehensive Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

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2014 (Current) 2015/2016 (Proposed) \$114,308 \$131,376 Incentives \$147,230 Non-Incentive Cost \$152,433 \$283,809 \$261,538 Total Program Cost

72. The last approved budget for this program, approved in Decision No. 74599, was \$283,809 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$238,654. The proposed budget for this program for 2015/2016 as can be seen above is \$261,538 which represents a decrease of \$22,271 from the 2014 budget or roughly an 8 percent decrease.

Recommendations

73. With actual 2014 expenses being lower than budgeted for 2014, Staff has recommended continuation of the Behavioral Comprehensive Program along with approval of the decrease in the budget dollars to \$261,538.

Education and Outreach Program M.

Current Program

This program is responsible for the marketing of the UNS Electric portfolio as a 74. whole, as well as general consumer education about energy efficiency.

Proposed Changes

75. The Company has not proposed any changes to this program.

Proposed Budget

76. The 2015/2016 proposed budget for the Education and Outreach Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	2014 (Current)	2015/2016 (Proposed)
Incentives	\$0	\$0
Non-Incentive Cost	\$141,884	\$106,050
Total Program Cost	\$141,884	\$106,050

77. The last approved budget for this program, approved in Decision No. 74599, was \$141,884 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$57,007. The proposed budget for this program for 2015/2016 as can be seen above is \$106,050 which represents a decrease of \$35,834 from the 2014 budget or roughly a 25 percent decrease.

Recommendations

78. Staff recognizes that the level of participation in the Education and Outreach program has been high over the past year. Reported costs are lower than budget and no direct energy savings are reported for this program; however, the Education and Outreach program is a support program that enables the success of other measures. Given the actual expenses incurred for 2014 were less than budgeted, Staff has recommended continuation of the Education and Outreach Program with a decrease in the budget to \$106,050.

N. <u>Codes Support Program</u>

Current Program

79. This program strives to maximize energy savings through adherence to local building energy codes and enhanced energy efficient appliance standards.

Proposed Changes

80. The Company has not proposed any changes to this program.

Proposed Budget

81. The 2015/2016 proposed budget for the Codes Support Program is detailed below. Overall Program Development, Analysis, and Reporting costs would be allocated across all of the cost-effective energy efficiency programs.

	2014 (Current)	2015/2016 (Proposed)
Incentives	\$0	\$0

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Non-Incentive Cost	\$18,447	\$34,020
Total Program Cost	\$18,447	\$34,020

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82. The last approved budget for this program, approved in Decision No. 74599, was \$18,447 for 2014. According to the DSM Program Report filed by the Company on February 27, 2015, the actual expenses incurred in 2014 for this program were \$2,718. The proposed budget for this program for 2015/2016 as can be seen above is \$34,020 which represents an increase of \$15,573 from the 2014 budget or roughly an 84 percent increase.

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Recommendations

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83. Even though actual expenses incurred for 2014 were less than budgeted, Staff recognizes that TEP recently had approved a Codes Support program and participation levels may increase if both companies are pursuing codes education so Staff has recommended approval of the increase in budget dollars to \$34,020.

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Home Energy Reports Program

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New Program

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84. UNS Electric may offer a re-designed version of the Home Energy Reports ("HER") Program. The purpose of the HER program is to provide customers with periodic reports that summarize their home energy usage. The reports may include comparisons to a peer group of similarly situated customers, energy savings tips or information about other UNS Electric programs.

Staff evaluated energy efficiency programs and measures based on cost-effectiveness.

the approved budget for the HER program shall not exceed \$250,000 per year.

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Proposed Budget

Recommendations

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85. UNS Electric may fund the HER program through reallocations within the approved portfolio budget. Prior to implementing the HER program, UNS Electric will provide Staff with the

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cost-benefit data used to analyze the program. If the HER program is implemented by UNS Electric,

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UNS Electric does not have the costs and savings associated with a re-designed version of a HER

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 program yet established. Staff is not opposed to a HER measure for UNS Electric, if it can be designed to meet a benefit-cost ratio of at least 1.0.

87. Given the relatively small size of UNS Electric's service territory, should UNS Electric decide to implement a HER program, this program should be implemented in conjunction with TEP so as to maximize the potential cost-effectiveness of the program.

BUDGET

UNS Electric 2015	5/2016 EE BU	DGET	-
	Current	UNS	Staff
		Proposed	Proposed
	2014	2015/2016	2015/2016
Residential Programs			
Efficient Products	\$834,727	\$890,512	\$888,245
Appliance Recycling	\$133,513	\$89,765	\$89,765
Res. New Construction	\$98,342	\$282,618	\$282,618
Existing Homes and Audit Direct Install	\$872,989	\$2,149,484	\$2,119,484
Shade Tree	\$34,100	\$35,343	\$35,343
Low Income Weatherization	\$351,817	\$421,485	\$351,817
Multi-Family	\$41,946	\$282,680	\$266,930
Subtotal	\$2,367,434	\$4,151,887	\$4,034,202
C&I Programs		-	
C&I Facilities	\$894,696	\$911,229	\$911,204
Bid for Efficiency	\$323,582	\$292,005	\$292,005
Retro-Commissioning	\$122,116	\$205,815	\$205,815
C&I Demand Response	\$388,544	\$374,850	\$374,850
Subtotal	\$1,728,938	\$1,783,899	\$1,783,874
Behavioral Programs			
Home Energy Reports	\$50,000	\$0	\$0
Behavioral Comprehensive Program	\$283,809	\$261,538	\$261,538
Subtotal	\$333,809	\$261,538	\$261,538
Support Programs			
Education and Outreach	\$141,884	\$106,050	\$106,050
Codes Support	\$18,447	\$34,020	\$34,020
Program Development, Analysis and Reporting	\$200,000	\$200,000	\$200,000
Subtotal	\$360,331	\$340,070	\$340,070
Total	\$4,790,512	\$6,537,394	\$6,419,684

88. The above table details UNS Electric's proposed energy efficiency budget for 2015/2016 and Staff's recommended budget.

BUDGET SHIFTING

WAIVER REQUEST

- 89. In Decision No. 72747 dated January 20, 2012 (and reaffirmed in Decision No. 74262), UNS Electric was given the ability to increase its overall portfolio budget by 5 percent if necessary without requiring further Commission approval. UNS Electric was also given the flexibility to shift up to 25 percent of a program's budget between programs but not shift funds between residential and non-residential program sectors.
- 90. Staff recognizes the importance of flexibility in a budget in being able to respond to changing market conditions. Staff has recommended UNS Electric continue being afforded the flexibility to increase the budget 5percent without requiring Commission approval. Staff also has recommended that UNS Electric have the ability to shift up to 25 percent of a program's budget between programs but not shift funds between residential and non-residential program sectors excluding the budget dollars designated for the LIW program.

91. In its application filed on June 2, 2014, and the letter to the same docket on June 1,

2015, UNS Electric requested a waiver under the provisions of A.A.C. R14-2-2419 from the 2015-2016 savings percentage mandate set in A.A.C. R14-2-2404. UNS Electric maintains that it is proposing a portfolio of programs likely to be successful within its service territory for its customer base. UNS Electric has proposed cost-effective programs toward the objective of reducing energy use and reducing peak demand. UNS Electric believes its 2015/2016 EE Plan will maximize the potential

for energy efficiency savings in a cost-effective manner.

92. Staff recognizes that the primary factor which has contributed to UNS Electric's ability to closely meet the savings percentage standards established in the EE Standard is the declining retail sales the Company has experienced over the past couple of years. Given the level of sales anticipated for 2015 and holding constant the level of kWh savings generated from energy efficiency programs (including new measures), UNS Electric anticipates it will not meet the standards as specified in R14-

2-2404 but may be slightly below the standards in both years. Staff estimates UNS Electric may reach a savings percentage around 9 percent in 2015. The EE Standard for 2015 is 9.5 percent of prior year's retail sales.

UNS Electric has indicated and Staff agrees that a consideration when looking at UNS Electric's ability to meet a growing EE Standard is its ability to implement new programs and measures to meet customers' needs. UNS Electric has had limited ability over the past few years to implement any new cost-effective programs/measures. Staff recognizes the importance of the EE Standards and compliance with those standards but also recognizes UNS Electric has experienced limitations beyond the Company's control with meeting those standards; therefore, Staff has recommended that UNS Electric receive a waiver of the 2015 EE Standard. Staff recognizes UNS Electric may have a better opportunity to meet the 2016 EE Standard of 12 percent of prior year's retail sales with the implementation of new measures.

DSM SURCHARGE

- 93. Decision No. 74599 set the current DSM Surcharge at \$0.001500 per kWh. The Decision further directed the surcharge remain in effect until the next Energy Efficiency Implementation Plan is approved or the next adjustor reset filing.
- 94. As of the end of April 2015, UNS Electric was over-collected \$3,994,962 in its DSM Surcharge collections compared to expenses.
- 95. The current DSM Surcharge of \$0.001500 per kWh multiplied by the annual kWh for 2014 of 1,677,445,410 would lead to revenue dollars of \$2.5 million to cover budgeted expenses for 2015 of \$4.8 million. If the retail sales for UNS Electric are actually 4 percent less than in 2014 as has been forecasted and another 2 percent drop from 2015 to 2016 and the performance incentive remains near the level of \$490,334 similar to what it was for 2014, UNS Electric will return most of the over-collected DSM Surcharge balance over the next two years. Given the above circumstances, Staff has recommended that the DSM Surcharge stay at its current level of \$0.001500 per kWh.
- 96. Staff also has recommended that this surcharge remain in effect until UNS Electric's next Energy Efficiency Implementation Plan is approved or until the next adjustor reset filing. At that

1	time, the over-collection or under-collection would be evaluated again to gauge if a change is
2	necessary.
3	CONCLUSIONS OF LAW
4	1. UNS Electric, Inc. is an Arizona public service corporation within the meaning of
5	Article XV, Section 2, of the Arizona Constitution.
6	2. The Commission has jurisdiction over UNS Electric, Inc. and over the subject matter
7	of the application.
8	3. The Commission, having reviewed Staff's memorandum dated August 26, 2015,
9	concludes that it is in the public interest to approve the Energy Efficiency Plan modifications as
10	discussed herein.
11	<u>ORDER</u>
12	IT IS THEREFORE ORDERED that the LED Home Lighting, Energy Star Central Air
13	Conditioner, Energy Star Clothes Washer, Energy Star Dishwasher, Energy Star Refrigerator, Energy
14	Star Room Air Conditioner and Variable Speed Pool Pump are approved as new/re-instated measures
15	in the Efficient Products Program.
16	IT IS FURTHER ORDERED that the 2x Incandescent is not approved as a new measure in
17	the Efficient Products Program.
18	IT IS FURTHER ORDERED that the Efficient Products Program is continued with a budget
19	of \$888,532.
20	IT IS FURTHER ORDERED that the Residential Appliance Recycling Program is continued
21	with a budget of \$89,765.
22	IT IS FURTHER ORDERED that the Residential New Construction Program is continued
23	with a budget of \$282,618.
24	IT IS FURTHER ORDERED that the Air Sealing-Attic Insulation and ER HVAC with QI
25	and Duct Sealing measures are discontinued as available measures in the Existing Homes and Audit
26	Direct Install Program.

IT IS FURTHER ORDERED that the DTR Tier 1, DTR Tier 2, ER HVAC with QI, EF
HVAC QI Tier 1 DTR, ER HVAC QI Tier 2 DTR, Tune Up-Advanced Tune Up, Tune Up-WCC
Stand Alone, HVAC QI, HVAC QI Tier 1 DTR, and HVAC QI Tier 2 DTR are approved as new/re
instated measures in the Existing Homes and Audit Direct Install Program.

IT IS FURTHER ORDERED that the Tune Up-BPM/ECM Motor is not approved as a new measure in the Existing Homes and Audit Direct Install Program.

IT IS FURTHER ORDERED that the Exiting Homes and Audit Direct Install Program is continued with a budget of \$2,119,484.

IT IS FURTHER ORDERED that the Shade Tree Program is continued with a budget of \$35,343.

IT IS FURTHER ORDERED that the Residential Low Income Weatherization Program is continued with a budget of \$351,817.

IT IS FURTHER ORDERED that the Tune Up-Advanced Tune Up, Tune Up-WCC Stand Alone, DTR Tier 1 and DTR Tier 2 are approved as new measures in the Residential Multi-Family Program.

IT IS FURTHER ORDERED that the Tune Up-BPM/ECM Motor is not approved as a new measure in the Residential Multi-Family Program.

IT IS FURTHER ORDERED that the Residential Multi-Family Program is continued with a budget of \$266,930.

IT IS FURTHER ORDERED that the LED Indoor Lighting, LED Outdoor Lighting, Interior High-Bay LED Lighting, T-8 or T-12 to LED Tubes, Exterior HID to LED, Canopy LED, Computer Power Monitoring System, Refrigerated Case LED, EMS HVAC Delivery, HVAC System Test and Repair, Strip Curtains, High Efficiency SEER Packaged and Split AC, and High Efficiency SEER Packaged and Split HP are approved as new measures in the combined C&I/Schools Facilities Program.

IT IS FURTHER ORDERED that the 14 SEER Packaged and Split AC, 15 SEER Packaged and Split AC, 16 SEER Packaged and Split AC, 14 SEER Packaged and Split HP, 15 SEER Packaged

and Split HP, and the 16 SEER Packaged and Split HP measures are discontinued as available measures in the combined C&I/Schools Facilities Program.

IT IS FURTHER ORDERED that the EMS Lighting is not approved as a new measure in the combined C&I/Schools Facilities Program.

IT IS FURTHER ORDERED that the combined C&I/Schools Facilities Program is continued with a budget of \$911,204.

IT IS FURTHER ORDERED that the incentive cap for all customers in the C&I Schools/Facilities Program is adjusted to 20 percent of the incentive dollars detailed in the Staff-proposed budget in Finding of Fact No. 47.

IT IS FURTHER ORDERED that UNS Electric is not limited to paying incentive dollars to only two LPS customers within the C&I Schools/Facilities Program, but UNS Electric shall detail in its 2015 and 2016 Annual Demand Side Management Reports the amount of incentive dollars paid to each customer during that calendar year.

IT IS FURTHER ORDERED that the Bid for Efficiency Program is continued with a budget of \$292,005.

IT IS FURTHER ORDERED that the Retro-Commissioning Program is continued with a budget of \$205,815.

IT IS FURTHER ORDERED that the C&I Demand Response Program is continued with a budget of \$374,850.

IT IS FURTHER ORDERED that the Behavioral Comprehensive Program is continued with a budget of \$261,538.

IT IS FURTHER ORDERED that the Education and Outreach Program is continued with a budget of \$106,050.

IT IS FURTHER ORDERED that the Codes Support Program is approved with a budget of \$34,020.

IT IS FURTHER ORDERED that UNS Electric may implement the HER program in conjunction with similar HER program at TEP. The budget for the UNS Electric HER program may

not exceed \$250,000 per year. Prior to the implementation of the HER program, UNS Electric shall provide Staff with the cost-benefit data used to analyze the program providing cost-effectiveness at or above 1.0. UNS Electric shall not implement the program if the benefit-cost ratio is below 1.0.

IT IS FURTHER ORDERED that UNS Electric has the flexibility to increase the overall portfolio budget by 5 percent if necessary.

IT IS FURTHER ORDERED that UNS Electric has the flexibility to shift up to 25 percent of a program's budget between programs but not shift funds between residential and non-residential program sectors excluding the budget dollars designated for the Residential Low Income Weatherization Program.

IT IS FURTHER ORDERED that UNS Electric has the flexibility to offer cost-effective energy efficiency measures approved by the Commission for one specific UNS Electric program in any of its other Commission-approved programs so long as the measures would remain cost-effective when offered in those other programs, and its overall demand side management budget would not be increased. UNS Electric should file documentation with the Commission demonstrating that the measure would remain cost-effective and its overall demand side management budget would not be increased. The UNS Electric proposal would be effective in 45 days unless Staff or other stakeholders act to oppose the proposal and seek further Commission review.

IT IS FURTHER ORDERED that UNS Electric is hereby granted a waiver of the Energy Efficiency Standard requirement as stated in A.A.C. R14-2-2404 for calendar year 2015.

IT IS FURTHER ORDERED that the DSM Surcharge remain at \$0.001500 per kWh.

1	IT IS FURTHER ORDERED that the DSM Surcharge set herein will remain in effect until
2	UNS Electric's next Energy Efficiency Implementation Plan is approved or until the next adjustor
3	reset filing.
4	IT IS FURTHER ORDERED that this Decision shall become effective immediately.
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6	BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION
7	BITTHE ORDER OF THE ARIZONA COMPONITION COMMISSION
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9 4	CHAIRMAN COMMISSIONER
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11	COMMESSIONER CONTUCTIONER
12	COMMISSIONER COMMISSIONER COMMISSIONER
13	IN WITNESS WHEREOF, I, JODI JERICH, Executive Director of the Arizona Corporation Commission, have
14	hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of
15	Phoenix, this 27 day of Challes, in the City of
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17	JODI JEKICH
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SERVICE LIST FOR: UNS Electric, Inc. 1 DOCKET NO. E-4204A-14-0178 2 Michael W. Patten 3 SNELL & WILMER L.L.P. One Arizona Center 4 400 East Van Buren Phoenix, Arizona 85004-2202 5 Bradley S. Carroll 6 UNS Electric Inc. 7 Legal Department, MS HQE910 Post Office Box 711 8 Tucson, Arizona 85702 9 Mr. Thomas M. Broderick Director, Utilities Division 10 Arizona Corporation Commission 11 1200 West Washington Street Phoenix, Arizona 85007 12 Mr. Dwight D. Nodes 13 Chief Administrative Law Judge Arizona Corporation Commission 14 1200 West Washington Street 15 Phoenix, Arizona 85007 16 Ms. Janice M. Alward Chief Counsel, Legal Division 17 Arizona Corporation Commission 1200 West Washington Street 18 Phoenix, Arizona 85007 19 20 21 22 23 24 25 26 27

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