Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007

Dear Chairman Forese and Commissioners,

Re: E-019333A-17-0250, "In the matter of the application of Tucson Electric Power Company for approval of its 2018 Energy Efficiency Implementation Plan"

Re: E-01345A-17-0134, "In the matter of the application of Arizona Public Service Company for a Ruling relating to its 2018 Demand Side Management Implementation Plan.

I write on behalf of the Ceres BICEP Network, a coalition of major employers and large electricity customers across the United States, to express our support for Arizona’s strong clean energy commitments. The Ceres BICEP, Business for Innovative Climate and Energy Policy, Network includes 9 companies with a footprint in Arizona. I appreciate the opportunity to bring the corporate perspective to these issues, highlighting how regulations and utility programs can enable the cost-effective clean energy solutions that attract business and investment to the state.

With a strong renewable portfolio standard and one of the most ambitious energy efficiency standards in the nation, Arizona’s current policies have catalyzed the development of a robust clean energy sector. These policies create high-paying jobs and increase capital investments in the state by providing companies with the certainty and predictability they need to make long-term clean energy investment decisions.

Our members, like many leading businesses across the United States, have set ambitious climate, clean energy, and energy efficiency goals. Clean energy solutions help businesses cut energy costs, avoid the volatility of fossil fuel prices, and stay competitive. Ceres’ analysis has shown that renewable energy and energy efficiency are saving U.S. companies $3.7 billion a year, savings they can reinvest into their business and their communities. With ambitious clean energy commitments and program offerings that increase corporate participation, the Commission can drive cost savings that benefit all ratepayers. The Commission should continue Arizona’s leadership in energy efficiency beyond 2020, as it is the lowest cost resource for improving customer value, system performance, pollution management, and cost control.

1 https://www.ceres.org/resources/reports/power-forward-3
As large employers and major energy consumers, our members know firsthand how energy policies impact the cost of doing business. Policies and programs that incentivize renewables and energy efficiency create a diversity of cost effective options for companies. By encouraging variety and enabling affordability, the Commission can support businesses’ decision to allocate capital towards clean energy products, systems and services within Arizona, over other competing investment opportunities.

On behalf of the Ceres BICEP Network, I appreciate your time and consideration. I hope you will continue to enable further investment and growth in Arizona by encouraging utilities to prioritize renewables and energy efficiency as competitive and least-cost energy resources.

Sincerely,

Anne Kelly
Senior Director, Policy and BICEP Network, Ceres
On behalf of Ceres BICEP Network

*For more information on the Ceres BICEP Network visit:* https://www.ceres.org/networks/cheres-policy-network

*Ceres is a sustainability nonprofit organization leading the most influential companies and investors to take action on clean energy policy.*