



COUNTY ADMINISTRATOR'S OFFICE

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C.H. HUCKELBERRY
County Administrator

March 9, 2020

Arizona Corporation Commission
1300 W. Washington Street
Phoenix, Arizona 85007

Re: **March 10-11, 2020 Stakeholder Meeting and Workshop; and
Docket No. RU-00000A-18-0284 Modification to Energy Rules**

Dear Chairman and Commissioners:

It is my understanding that the Arizona Corporation Commission (ACC) is considering possible modifications to its energy rules and is holding workshops on March 10 and 11, 2020 to solicit input from stakeholders. Although there are many issues included in the energy rules docket, this workshop appears to be focused on resource planning and procurement, Renewable Energy Standard and Tariff (REST), and energy efficiency standards.

The comments I am submitting today relate to Pima County's specific interest in reducing carbon emissions from County operations and how changes to the renewable energy standard could aid in achieving this. Pima County has a strong history of adopting and implementing policies and practices that not only protect the natural environment but also ensure a sustainable economic future for our residents and businesses.

In 2017, the Pima County Board of Supervisors adopted resolutions in support of the United States commitment to the Paris Agreement and specifically mandating the reduction of carbon emissions resulting from County facilities and operations by 28 percent as measured between 2005 and 2025. Pima County's Sustainable Action Plan for County operations adopted in 2018 includes specific and measureable targets to achieve this mandate, including implementation strategies such as improving building efficiency, expanding renewable energy capacity including beneficial reuse of biogas and reducing carbon emissions from the County's vehicle fleet and solid waste.

Additionally, and surely more efficiently, Pima County will see a large reduction in carbon emissions by way of our major electric utility, Tucson Electric Power (TEP) reducing their carbon emissions. TEP appears to be on track to double its renewable energy portfolio by

Chairman and Commissioners, Arizona Corporation Commission
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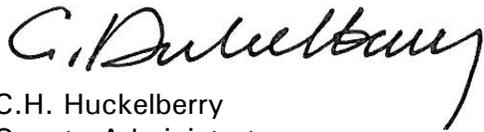
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the end of this calendar year, which will equate to 30 percent renewables as a percent of their retail load and a 33 percent reduction in carbon emissions. This far exceeds the current ACC renewable energy standard, which only requires 15 percent renewables by 2025; a requirement that is extremely outdated and ineffective based on the current understanding of climate change and the steps we need to take to slow global temperature increases.

As a member of the TEP Integrated Resource Planning Advisory Council, Pima County is advocating for TEP to continue to increase investment in community scale renewables through 2035, reduce reliance on coal and gas and adopt carbon emission reduction targets in line with the US commitment to the Paris Agreement. Whether the ACC chooses to revise the renewable energy standard to require set percentages of renewables by a particular year or years, or instead, requires emission reduction requirements by a particular year or years, is of less concern to Pima County. Regardless, the outcome must result in meaningful reductions in carbon emissions, which in turn will benefit Pima County current and future residents and businesses. In addition, Pima County is advocating for more locally sited renewables and, in particular, siting those renewables within the Davis-Monthan Air Force Base approach/departure corridor, which contains a significant amount of vacant State Trust land that could be leased at a reduced cost to incentivize this compatible use.

We appreciate this opportunity to comment and expect also to submit or make comments on other aspects of the proposed energy rule modifications.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/lab

c: The Honorable Chairman and Members, Pima County Board of Supervisors
Jan Leshar, Chief Deputy County Administrator
Carmine DeBonis, Jr., Deputy County Administrator for Public Works