

April 23, 2021



Chairwoman Lea Márquez Peterson
Justin Olson
Sandra D. Kennedy
Anna Tovar
Jim O'Connor

Re: Docket Number RU-00000A-18-0284: AzPHA Support for the Energy Rule Package

Dear Arizona Corporation Commissioners:

On behalf of the Arizona Public Health Association (AzPHA), I am expressing our support for the proposed final Clean Energy Rules including the Office of Administrative Hearing's Administrative Law Judge [Recommended Opinion and Order](#) and the revised Economic Impact Statement supporting the Rules.

We urge you to adopt the Clean Energy Rules without amendment and ask Arizona Corporation Commission staff to submit the Energy Rules to Arizona Attorney General Brnovich for final certification.

We believe that the final Rule, the Recommended Opinion and Order, and the revised Economic Impact Statement are comprehensive and incorporate the essential core elements of good public health policy as it will:

- 1) reduce carbon emissions;
- 2) address our climate crisis;
- 3) help clean up our air;
- 4) conserve our water; and
- 5) improve the health of our communities.

The Commission's Energy Rules went through a rigorous public input process as evidenced by several elements in the Rule that are creative and will serve to improve the social determinants of health. The social determinants of health are a key determinant of public health outcomes in Arizona.

We are pleased that the Commission's Energy Rules calling for 100% emissions-free energy by 2050 are not specific about which technologies need to be used to achieve the goals. We believe this will lead to more efficient economic decisions over time which will keep rates down. Affordable utility rates are important as lower rates help working families by making it easier for them to provide a healthy environment for their families.

The Rules leverage both energy efficiency and renewable energy to help control utility costs, create jobs, and build a cleaner energy future. Jobs created by energy efficiency and renewable energy will likely pay a living wage and are in fields like installation which will be filled by Arizona residents.

The Rules incentivize increased investments in distributed solar storage which will provide residents more ways to save money on their utility bills, putting them in a better position to provide resources to improve the health of their families.

Importantly, the Commission's Energy Rules also protect low-income communities at risk of local economic disruptions by including preferential siting of renewable energy projects in communities impacted by the early closure of coal-fired power plants.

There is also good evidence that the public and specifically voters support clean energy and energy efficiency standards.

- Arizona voters [overwhelmingly recognize that climate change represents a significant present-day threat](#) and strongly support actions to boost renewable energy and electric vehicles.
- Two-thirds of voters agree that [investments in clean energy should benefit the communities most impacted by pollution](#), including Black, Hispanic, and Native American communities.
- A full [70% of voters the requirement](#) for Arizona utilities to get 100% of energy from carbon free sources by 2050.
- Over [80% of voters support greater investment in energy efficiency](#), and 79% believe that Arizona should utilize more solar power.

The Arizona Public Health Association supports the Commission's Energy Rules which were developed after years of study, more than a dozen public meetings, thousands of written comments, and hundreds of hours of engagement by interested Arizonans.

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We appreciate your time and consideration as the Commission and Administrative Law Judge reviews these comments. We also look forward to partnering with you to move these Energy rules forward for Arizona.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Humble", with a long, sweeping flourish extending to the right.

Will Humble, MPH
Executive Director,
Arizona Public Health Association
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