

UGL comments on the 2019 APS Draft Scope of Work

General comments:

- Consider debriefing the Advisory Group with a lessons learned summary and discussion in advance of developing the RFP (e.g. on the agenda for the next meeting) – to ensure alignment on outcomes and to avoid past disappointments (be what they may from the prior electric or gas APS experience)
- Recommend engaging with the Advisory Group to review and provide comment on the draft RFP, prior to release.

Task 2/3 – slides 23-24

- It isn't clear how or if free-ridership will be incorporated into the base case and the potential that will be evaluated. How will it line with current net-to-gross considerations?

Task 4/5 – slides 25-26

- Recommend that achievable potential for “large” end-users (e.g. LFEs and C&T voluntary participants) consider segment and operational specific opportunities vs. a “measure-based” approach – given the finite and unique nature of opportunities with large customers, and materiality of GHG reduction potential in this segment, a measure-based approach doesn't seem appropriate.
- Alternatively, consider elements in and out of scope for “large” end-users for the 2019 APS – or at least acknowledge gaps or inaccuracy in approach for this segment if a measure-based approach is taken.