March 2, 2016

The Honorable Gary Herbert
Governor of Utah
340 North State Street
Salt Lake City, UT 84114

Dear Governor Herbert:

As you know, energy efficiency is the lowest-cost demand side energy resource – cheaper than electric or gas generation and renewables. Even with the U.S. Supreme Court’s recent stay of the Clean Power Plan, the electric power sector is evolving toward a cleaner, more efficient energy system. As the regulators and energy planners in Utah continue their daily work to ensure reliable and affordable electricity to consumers, we encourage you to maximize your investment in energy efficiency. By reducing the need for central power generation, energy efficiency provides emissions reductions quickly, locally, and at a lower cost than other compliance options. It is also the only option that achieves sustained local job creation while also reducing emissions, mitigating the cost impacts of Clean Power Plan implementation, and giving Utah residents and businesses control over their energy bills. Actions such as improving manufacturing energy efficiency, reducing commercial buildings’ energy use, and delivering residential energy efficiency upgrades are the quickest and cheapest means to meet energy demand while simultaneously improving air quality.

Today, every state has at least some experience delivering energy-efficiency programs administered by electric utilities and the private sector. These programs have been very successful and can be expanded significantly. In addition, there are opportunities in Utah to achieve significant emission reductions through the implementation of non-utility administered energy-efficiency policies and programs. Such programs include investments in combined heat and power generation, adoption of building energy codes that leverage above-code green building certification, residential retrofit financing programs and procurement of energy savings performance contracts (ESPCs) to upgrade large buildings and facilities. Non-utility efficiency programs, taken as a whole, generate as much investment in energy savings as utility programs and should not be underestimated. For example, the ESPC market in the U.S. generates more than $5 billion annually in new investments.

We commend the energy-efficiency initiatives Utah has taken, specifically with regards to the strict building energy codes for both commercial and residential buildings, as well as the adoption in 2008 of a renewable energy standard, which includes energy-efficiency measures. While Utah may not be supportive of the Clean Power Plan, if your state ultimately decides to submit a plan to avoid the imposition of a Federal Plan, we urge you to consider maximizing the use of this least-cost mechanism by expanding your existing programs. To maximize cost-effective emissions reductions under the plan, we also recommend that you opt into the Clean Energy Incentive Program (CEIP).

The attached fact sheet shows how the implementation of a few common energy-efficiency policies, such as adoption of an energy-savings target, updated building energy codes, and increased use of combined heat and power can meet 47 percent of Utah’s 2030 compliance goal under the Clean Power
Plan, all while saving customers money and growing the Utah economy. In fact, utilizing efficiency measures to reach Utah’s goal would save the people of Utah $5.8 billion, not to mention avoiding over 3.9 million tons of carbon dioxide, and reducing other toxic air pollutants that negatively affect our health.

Energy efficiency is not a “new” resource; however, applying these tools to achieve carbon reduction goals under Section 111(d) of the Clean Air Act is an entirely new context. Several tools are available for your staff and responsible state agencies to guide your decisions about Clean Power Plan implementation options, regardless of whether you pursue a mass-based or a rate-based plan. For further information and to ask questions specifically about incorporation of energy efficiency in your plan, please contact the National Association of State Energy Officials at http://cpp.naseo.org/asq, as well as any of the signatories below.

We are ready to work with you and your state officials to ensure that efforts to reduce emissions via the Clean Power Plan or any other means are as cost effective as possible. **Energy efficiency is the cleanest, fastest, most cost-effective compliance strategy available, and has the most direct impact on controlling consumers’ electricity bills.** Energy efficiency is also embraced by the private sector, for the operating costs it saves and its value for resilience and risk reduction. Additionally, energy efficiency creates lasting, non-exportable jobs and grows the economy while reducing consumer costs. We encourage you to use it robustly, and we stand ready to assist you.

Cc: Utah Public Utilities Commission; Utah Department of Environmental Quality, Division of Air Quality; Utah Office of Energy Development

Sincerely,

**ABB Inc.**  
Jim Creevy, Senior Director, Government Affairs  
Jim.creevy@us.abb.com

**Alliance for Industrial Efficiency**  
Jennifer Kefer, Executive Director  
jennifer@dgardiner.com

**Alliance to Save Energy**  
Kelly Speakes-Backman, Senior Vice President of Policy and Research  
ksbackman@ase.org

**Ameresco**  
Ashley Patterson, Director of Government Affairs and Public Policy  
apatterson@ameresco.com

**American Chemistry Council**  
Rudy Underwood, Vice-President of ACC State Affairs  
Rudy_underwood@americanchemistry.com
American Council for an Energy-Efficient Economy
Sara Hayes, Senior Manager and Researcher, Air and Climate Policy
shayes@aceee.org

AMSEnergy Corp
Michael Sams, CEO & President
michael.sams@amsenergy.com

Bruce Harley Energy Consulting, LLC
Bruce W. Harley, Principal
bruceharleyenergy@gmail.com

Building Performance Institute (BPI)
Larry Zarker, CEO
lzarker@bpi.org

CALMAC
Mark M. MacCracken, CEO
Mm@calmac.com

Columbia University, School of International & Public Affairs
Lloyd Kass, Adjunct Faculty, Environmental Science and Policy Program
lrk13@columbia.edu

Danfoss
John Galyen, President, North America
johngalyen@danfoss.com

E4TheFuture
Stephen Cowell, Executive Director
scowell@e4thefuture.org

Ecothermal Filters
Darcy McMenamin, President and CEO
Darcy@ecothermalfilters.com

Efficiency First
Kara Saul Rinaldi, Government Affairs
kara@anndyl.com

Energy Resources Center
Cliff Haefke, Interim Director
chaefk1@uic.edu

Environment Texas
Sara E. Smith, Staff Attorney
sara@environmenttexas.org
Environmental and Energy Study Institute  
Carol Werner, Executive Director  
Cwerner@eesi.org

Hannon Armstrong  
Robert Johnson, Senior Vice President at Hannon Armstrong Sustainable Infrastructure  
rjohnson@hannonarmstrong.com

Home Performance Coalition  
Kara Saul Rinaldi, Vice President of Government Affairs and Policy  
kSaul-rinaldi@homeperformance.org

Honeywell  
Nick Kirkhorn, Government Relations  
nicholas.kirkhorn@honeywell.com

JW Crouse, Inc.  
Jesse Crouse, President  
jwcincps@verizon.net

Knauf Insulation  
George R. Phelps, Public Affairs Manager  
George.phelps@knaufinsulation.com

Lime Energy  
Adam Procell, President and CEO  
aprocell@lime-energy.com

NAESCO  
Donald Gilligan, President  
dgilligan@naesco.org

National Electrical Contractors Association (NECA)  
Marco A. Giamberardino, MPA, Executive Director, Government Affairs  
mgiamberardino@necanet.org

National Housing Trust  
Todd Nedwick, Housing and Energy Efficiency Policy Director  
tnedwick@nhtinc.org

North American Insulation Manufacturers Association  
Curt Rich, President and CEO  
crich@naima.org

Ohio Sustainable Business Council  
Mayda Sanchez, Executive Director  
Msanchez@ohiosbc.org
Owens Corning
John Libonati, Vice President of Government and Public Affairs
John.Libonati@owenscorning.com

Powder River Basin Resource Council
Bob LeResche, Chair
sanderson@powderriverbasin.org

Schneider Electric
Anna Pavlova, Vice President, Government Relations
Anna.Pavlova@schneider-electric.com

Siemens Corporation
Tom Phillips, Senior Director, State & Local Government Affairs
tom.phillips@siemens.com

Stoney Point Farms
Larry Lambeth, President
llamrtment@hotmail.com

TerraShares
John Atkins, President
jatkins@terrashares.com

The Dow Chemical Company
Greg Bergtold, Business Advocacy & Policy Director
gsbergtold@dow.com

Trane
Douglas M. Young, Energy Services Leader
dmyoung@trane.com

U.S. Green Building Council
Elizabeth Beardsley
Ebeardsley@usgbc.org

VEIC
Mary Sprayregen, Deputy Director, Policy and Public Affairs
msprayregen@veic.org

Veolia North America
Elinor Haider, Vice President, Market Development
elinor.haider@veolia.com

Washington Gas, a WGL Company
Doreen Hope, Federal Government & Business Relations
dhope@washgas.com