Dear Chairman Burns and Commissioners:

Re: E-01345A-19-0088, In the matter of the application of Arizona Public Service Company for a Ruling Relating to its 2020 Demand Side Management Implementation Plan.

As you may already know, Dignity Health’s Arizona Division includes six hospitals – Chandler Regional Medical Center, Mercy Gilbert Medical Center, St. Joseph’s Hospital and Medical Center, which includes Barrow Neurological Institute, St. Joseph’s Westgate Medical Center, Arizona General Hospital’s in Laveen and Mesa. From this foundation, Dignity Health’s Arizona Division has expanded into a comprehensive health care system, which includes imaging centers, clinics, specialty hospitals, urgent cares, insurance providers, an accountable care organization and other clinical partnerships. The Dignity Health Arizona Division is part of CommonSpirit Health, the second-largest nonprofit hospital system in the nation.

Dignity Health writes to support Commission approval of Arizona Public Service Company's (APS) 2020 Demand Side Management Plan, including the new proposed energy-saving offerings for nonprofits. We are committed to building healthier communities, advocating for those who are poor and vulnerable, and innovating how and where healing can happen—both inside our hospitals and out in the community. Approval of the plan would help to deliver upon this mission for several reasons:

1. Air pollution is an environmental threat to human health, and energy production and energy use account for air pollution caused by human activity. Investment in energy efficiency helps to reduce pollution and emissions, improve indoor and outdoor air quality, and save lives. This is particularly important in Arizona, where more residents are affected by asthma than the national average, with nearly 10% of adult residents and nearly 11% of youths suffering from it. The occurrence of asthma in the state is also rising at a faster pace than nationally.

2. Hospitals require a large amount of energy for transport, lighting, ventilation, air conditioning, and electric and electronic equipment. At the same time, the health care sector is experiencing extreme strain on our resources due to the COVID-19 crisis. We believe, green building strategies and innovative technologies that reduce energy use can help hospitals reinvest those savings into patient care and help hospitals maintain healthy healing and work environments, especially during these challenging times.

3. Unlike many other sectors, hospitals must be outage-proof and fully operational 24 hours a day, seven days a week. Hospitals must be able to provide services during power outages and...

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1 American Lung Association, The 2016 Arizona Asthma Burden Report
2 Ibid.
extreme weather events, including heat waves. Investments in efficient, resilient energy technologies and equipment help hospitals to maintain their services at all times.

4. Programs such as the Demand Side Management Implementation Plan that help infuse energy efficiency throughout the medical supply chain to support reducing the sector’s overall costs and reduce the sector’s overall greenhouse gas emissions is critically important at this time.

Therefore, we urge your approval of APS’s 2020 Demand Side Management Plan at your September Open Meeting.

Sincerely,

Shirley Gunther
Vice President, External Affairs
Dignity Health – Arizona Division