

July 19, 2018

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504

*Re: Docket No. UE-152072, PacifiCorp's Report Concerning its Progress in Meeting Its Conservation Target during 2016-2017, pursuant to RCW 19.285.070 and WAC 480-109-040*

The NW Energy Coalition and Renewable Northwest appreciates the opportunity to comment on Pacific Power & Light Company's (PacifiCorp or the Company) progress report on meeting its conservation goal during the 2016-2017 biennium. Both the Coalition and Renewable Northwest actively participate in PacifiCorp's Integrated Resource Plan (IRP) process, and the Coalition is a participant in PacifiCorp's Washington DSM Advisory Group, where is most of the information-sharing related to PacifiCorp's conservation programs in its Washington state service territory take place.

PacifiCorp has successfully achieved conservation savings of 92,727 MWh (after subtracting NEEA savings), which exceeds the commission-approved target, which includes a 2.5% decoupling obligation (90,009 MWh).

In the last four biennia, PacifiCorp has exceeded its EIA penalty targets, sometimes significantly. However, in the 2018-2019 biennium, PacifiCorp has proposed a 13% lower EIA penalty target than for 2016-2017 (78,268 MWh, including a 5% decoupling obligation). Given the importance that conservation plays in the region and for the Company's resource portfolio; the opportunities for deeper conservation savings in PacifiCorp's service area; and the Company's history of strong performance, we would encourage PacifiCorp to continue its strong progress of conservation in Washington State and set correspondingly high targets that encourage the Company to pursue deep and innovative efficiency programs.

Cordially,

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