

September 13, 2012

Public Utility Commission
Attn: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem, Oregon 97308

Re: Replacement Filing for Energy Trust Proposal for Gas Weatherization
Cost-Effectiveness Exceptions

On August 2, 2012, Energy Trust filed a request to the Commission to approve certain gas weatherization cost-effectiveness exceptions. The supporting documentation submitted as part of that original filing was incomplete, and this replacement filing is submitted with complete documentation. Please replace the original August 2, 2012 filing with this current and complete filing.

Energy Trust is asking the Commission to:

- Approve exceptions to existing cost-effectiveness guidelines for wall, floor and ceiling insulation for gas heated homes, for two years
- Approve exceptions to existing cost-effectiveness guidelines for multi-family boiler replacements, home solar domestic water heat, 0.67 energy factor water heaters, and manufactured home duct and air sealing for two years
- Approve exceptions to existing cost-effectiveness guidelines to allow for continuation of air sealing in gas homes, until further analysis is complete
- Approve the implementation of a two-phase prescriptive duct sealing pilot to run from 2012 to 2014

Attached to this cover letter is a supporting document that outlines the issues and details what we're asking for. The attached document also outlines how each request relates to the exceptions to cost effectiveness guidelines established in Commission Order UM 551.

In addition, due to the conditions described in the attached document and the cost effectiveness exceptions being requested, we anticipate the benefit to cost ratio for the gas component of our Existing Homes program will fall below 1. We ask the Commission for flexibility in meeting our performance measures for program cost effectiveness. We aim to bring the gas component of the Existing Homes program back to a benefit to cost ratio of 1 or greater by 2014.

Thank you for your consideration and please let me know if you have any questions or need clarification on these requests.

Debbie Menashe, Senior Counsel
503 445 7608
Debbie.menashe@energytrust.org