

July 12, 2016

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

RE: Docket No. UE-132047, Pacific Corporation Report Concerning its
Progress in Meeting Its Conservation Target during the preceding Biennium,
pursuant to RCW 19.285.070 and WAC 480-109-040

The NW Energy Coalition (Coalition) appreciates the opportunity to comment on Pacific Corporation's (PAC) progress report on meeting its' conservation goal during the preceding biennium.

PAC's report shows it achieved conservation savings of 98,881 MWhs, exceeding the Commission approved targets of 74,703 MWhs by 24,178 MWhs. We congratulate PAC for so handily exceeding the 2014-15 target. Given that PAC has easily exceeded the targets it set over the last three biennia, we would expect PAC to be more confident and pursue goals that are more in line with their actual achievement in the future.

PAC complied with the agreed upon approach of excluding NEEA conservation savings from the target summary. However, PAC does not report any separate NEEA savings at all in the report, presenting an incomplete picture of the total conservation program. While the three IOUs proposed and the Commission accepted the approach for the 2014-15 biennium to exclude NEEA savings equally from target setting and reporting savings achieved by each utility's programs, that did not remove the need to report on NEEA savings for PACs customers.

At this time, PAC is not a decoupled utility. However, if it is granted that status, the comments we made in both the PSE BCR Docket UE-132043 and Avista BCR Docket UE 132045 regarding the application of excess savings to the decoupling target would extend to PAC as well.

Thank you,

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