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| Pacific Power |
| 2010 Annual Report on Conservation Acquisition - Washington |
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# Introduction

PacifiCorp (or the “Company”) works with its customers to reduce the need for investment in supply side resources and infrastructure by reducing energy and peak consumption through cost-effective energy efficiency programs.

The Company currently offers six energy efficiency programs in Washington approved by the Washington Utilities and Transportation Commission (“Commission”), as well as receives energy savings and market transformation benefits through its affiliation with the Northwest Energy Efficiency Alliance (“NEEA”). The expenditures associated with these programs are recovered through the System Benefits Charge, Schedule 191 (“Schedule 191”).

This report provides details on program results and activities, expenditures and Schedule 191 revenue for the performance period from January 1, 2010 through December 31, 2010. As shown in Table 1 below, in 2010 the Company acquired resources through its energy efficiency program activity totaling 41,727,271 kWh/year or 4.76 aMWin Washington (at generation). Overall, the programs achieved a total resource cost test result, adjusted by 10 percent and inclusive of quantifiable non-energy benefits of 2.889.

**Table 1**



# Advisory Group Meetings and Communications

PacifiCorp established the Washington Demand-side Management Advisory Group (“DSM Advisory Group”) in 2000. The DSM Advisory Group includes representatives from a variety of constituent organizations and represents the interests of various customer segments. PacifiCorp met and/or communicated with the DSM Advisory Group on several occasions during 2010. Subject matter and meetings were as follows:

|  |  |
| --- | --- |
| **Date** | **Specific Topics** |
| March 19 | Schedule by which open issues regarding the Company’s 10-year potential and biennial target would be addressed |
| April 8 | Issues and open items raised by parties concerning the I-937 report |
| April 26 | The revised version of the 2010 – 2011 biennial conservation target report reflecting comments received from parties since it was originally filed with the Commission on January 29, 2010 |
| May 13 | Adjustment to the distribution efficiency targets included in the Company’s 2010 – 2011 biennial target |
| May 18 | The Company’s I-937 report and next steps |
| May 19 – June 28 | Continue discussions on the Company’s I-937 report and a conditions list |
| October 12 | Review of the 2011 DSM Business Plan Update |

Program change related meeting dates and topics

|  |  |
| --- | --- |
| **Date** | **Specific Topics** |
| September 23 | Planned changes to the FinAnswer Express program |
| October 12 | Planned changes to the Home Energy Savings Program |

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# Demand-side Management Filings

The Company made several DSM related filings with the Commission during calendar year 2010. The dates of the filings with descriptions are included below.

|  |  |
| --- | --- |
| **Date** | **Filing Information/Request** |
| January 29 | The Company’s ten-year achievable conservation potential, its biennial conservation target for 2010 and 2011 and a description of the process used in the development of the targets and potential |
| February 12 | Annual report for 2009 on DSM expenditures and SBC collections |
| July 2 | Revised report reflecting the comments of parties which identified the Company’s ten-year achievable conservation potential and its biennial conservation target for 2010 and 2011 |
| August 13 | Semi-annual report containing DSM expenditures and SBC collections from Jan 2010 to June 2010 |
| November 1 | Updated 2010/2011 Washington DSM business plan |

**Tariff modification occurring during 2010**

Modifications to the FinAnswer Express program were discussed with the DSM Advisory Group on September 23. The notification of the changes was posted on the Company’s website on October 6 and the changes became effective on November 20. The changes were primarily to update the program to align with changes in codes, standards, and specifications.

# 2010 Performance and Activity

In 2010, PacifiCorp achieved total savings of **41,727,271 kWh/year, or 4.76 aMW** in the State of Washington (at generation). Table 2 below shows savings by program and by sector[[1]](#footnote-1).

Table 2 – 2010 Performance[[2]](#footnote-2)



**Major Trends and Activities**

In 2010, the Company realized a decrease in overall energy efficiency savings of 11 percent compared to 2009. At a sector level, the residential sector savings decreased 3 percent on a kWh/year basis compared to 2009. The commercial sector delivered approximately 88 percent more kWh/year savings than in 2009. The industrial savings decreased 44 percent in 2010 compared to 2009

Expenditures related to program delivery increased in 2010 as compared to 2009. Overall portfolio expenditures increased by 16 percent compared to 2009, energy efficiency programs increased 8 percent and NEEA expenditures increased 78 percent in 2010 compared to 2009. At a sector level, residential energy efficiency expenditures increased by 7 percent while expenditures for commercial increased by 70 percent and industrial decreased by 13 percent.

The increase in commercial savings and expenditures was primarily driven from one lighting project. The industrial savings decrease was impacted by the economic downturn.

**Program Evaluations**

In 2010, the Company completed process and impact evaluations for the Home Energy Savings, See ya later, refrigerator**®**, Energy FinAnswer and FinAnswer Express programs in Washington. The results of these evaluations are available on PacifiCorp’s website at <http://www.pacificorp.com/es/dsm/washington.html>.

In 2010 the Company spent $671,890 on third-party program impact and process evaluations which represented 8.7 percent of the 2010 annual program expenditures. While the costs exceeded the targeted 4-6 percent spending on Evaluation, Measurement and Verification (EM&V), the 2010 evaluation activity represents multi-program and year evaluation work conducted to bring the Company’s program evaluations up-to-date and current. The Company’s scheduled 2011 EM&V activity reflects a more scheduled approach in EM&V planning and expenditures going forward.

# 2010 Business Plan Budget compared to Actual

The Company, consistent with requirements under Docket UE-100170, Order 02, Ordering Paragraph (8)(c), provides Table 3 which compares the Company’s July 2010 business plan budget to actual 2010 program performance.

In 2010, the Company delivered 41,727,271 kWh in first year energy savings against the 2010 business plan forecast savings of 38,039,856 kWh, a positive variance of approximately 9.7 percent.

**Table 3**



# Residential Energy Efficiency Programs and Activity

**Home Energy Savings Incentive Program (Schedule 118)**

The Home Energy Savings program, Schedule 118 (“Schedule 118”) was first approved in 2006 and provides a broad framework to deliver incentives for more efficient products and services for Washington residential customers with a new or existing home, multi-family unit or manufactured home. The Company uses a third party to administer this program. Schedule 118 and the program web site at [www.homeenergysavings.net](http://www.homeenergysavings.net) operate in tandem to inform customers and contractors of the offerings and qualifications for incentives.

Measures eligible for incentives include clothes washers, clothes washer recycling, refrigerators, water heaters, dishwashers, lighting (both compact fluorescent lamps (“CFLs”) and fixtures), heating and cooling equipment and services, insulation, windows and miscellaneous equipment such as ceiling fans. In addition, the program includes a Builder Option Package as well as stand-alone measures for new homes.

Incentives are provided in two ways: post-purchase delivery to the customer for the majority of measures and through a manufacturer buy-down for CFLs. Buy-downs result in lower retail prices for customers at the point of purchase as opposed to post-purchase incentives that customers must submit an application to receive.

Program results for 2010 are provided in Table 4 below.

**Table 4**



**2010 Program Performance**

Details of 2010 measure level participation and savings are provided on the following table.

**Table 5[[3]](#footnote-3)**



**Program Changes**

No program changes were implemented in 2010. The Company is planning to propose several changes to the program in 2011. The expected changes include:

* Addition of ductless heat pumps (single-head) for existing homes and ductless heat pumps (multi-head) for new homes,
* Incentive and equipment modifications to several existing measures,
* Changing CFL offerings to remove multi-pack categories,
* Updating savings for several measures to reflect current Regional Technical Forum (RTF) savings, and
* Realigning some measures with Northwest Energy Efficiency Alliance (NEEA) specifications.

**Program Evaluations**

Process and impact evaluations were completed in 2010 for the Home Energy Savings program for years 2006-2008. The results of these evaluations are available on PacifiCorp’s website at: <http://www.pacificorp.com/es/dsm/washington.html>

**Refrigerator Recycling (Schedule 107)**

The refrigerator recycling program, operated as the See ya later, refrigerator® program, was first approved effective April 1, 2005. This program aims to decrease residential refrigeration loads by reducing the number of inefficient secondary and primary refrigerator and freezer models in operation. With this program, the Company offers all residential customers in Washington the opportunity to receive a **$30** incentive in exchange for turning in their old but working refrigerators and/or freezers for recycling. Each customer can recycle up to two units, refrigerators and/or freezers, per household. In addition, a kit with instant energy saving measures is provided to each participating customer.

Program results for 2010 are provided in Table 6 below.

**Table 6**



Details on participation and savings are provided in the table below.

**Table 7**



In 2010, 1,883 units were recycled (79 percent refrigerators and 21 percent freezers) by 1,743 households. According to the program delivery vendor, the program recycled more than 120 tons of steel, 4 1/2 tons of aluminum and copper, 23 tons of plastics and prevented landfill deposits that would cover an entire football field more than two and a half feet deep. In addition, the greenhouse gases (CFCs) collected and destroyed during recycling equates to approximately 5 tons of CO2e per unit, equivalent to the annual output of the average car. The average age of the units recycled was 29 years with consumption approximately three times more than new units purchased today.

**Program Evaluations:**

Process and impact evaluations were completed in 2010 for the See ya later, refrigerator® program for program years 2006 – 2008. The results of these evaluations are available on PacifiCorp’s website at: <http://www.pacificorp.com/es/dsm/washington.html>

**Low Income Weatherization (Schedule 114)**

PacifiCorp partners with three local non-profit agencies, Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish and Opportunities Industrialization Center of Washington in Yakima, to provide weatherization services to income-qualifying households throughout its Washington service area. The leveraging of PacifiCorp funding along with Washington MatchMaker Program funds allows the agencies to provide these energy efficiency services to more households at no cost to participating customers. The Company provides rebates to partnering agencies for 50 percent of the cost of services while MatchMaker funds are available, and covers 100 percent of costs when these state funds are depleted. Participants qualify if they are homeowners or renters residing in single-family homes, manufactured homes or apartments. Over 6,700 homes have been completed since the program began in the mid-1980s.

Program results for 2010 are provided in Table 8 below.

**Table 8**



**Energy Education in Schools (Schedule 113)**

The energy education curriculum was developed for sixth grade classrooms by three partnering agencies (Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish and Opportunities Industrialization Center of Washington in Yakima). The agencies employ certified teachers to work with school administrators, teachers and students. They provide a minimum of 3 one-hour energy education sessions on topics such as electricity generation, conservation, meter reading and efficiency tips. Students receive a kit of measures including a CFL, a refrigerator/freezer temperature card, an electroluminescent nightlight, a shower timer, a hot water temperature card, a kitchen faucet aerator and a wall plate thermometer. A low flow showerhead is provided to those students where a water flow test indicates this need. In the 2009-2010 school year, 4,127 students completed the course with an estimated annual savings for measure installation of 633 kWh (at generator) per student. The Company believes the educational aspect of the program resulted in additional savings of approximately 1,444 kWh (at generator) per participating household as a result of behavioral changes in energy use. However, due to difficulty verifying these savings, they have not been included in the results in Table 9 and are not being reported for the purpose of either the achievement of the Company’s 2010 energy savings or towards the cost-effectiveness analysis of the program.

Table 9 includes savings from measure installations.

**Table 9**



Installed measure savings and the calculation of program cost-effectiveness in Table 9 above for the program include additional CFLs purchased by participating households. However, there is a high probability that these additional CFLs were purchased at retailers selling CFLs that were discounted as a result of the Home Energy Savings Incentive Program. To avoid double counting of these savings towards the Company’s 2010 program performance, the savings associated with the additional CFL purchases were removed from the Residential portfolio results and related cost-effectiveness calculations. The savings associated with these additional CFL installations were identified in the Washington Energy Education program assessment[[4]](#footnote-4) to be approximately 1,024,651kWh (at generator) for the 2009-2010 school year.

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# Non-Residential Energy Efficiency Programs and Activity

**FinAnswer Express (Schedule 115)**

The FinAnswer Express program is available to commercial, industrial, and agricultural customers in PacifiCorp’s Washington service territory. The program includes an expedited energy analysis and offers incentives for qualifying high-efficiency measures based on the equipment installed and listed in the incentive program incentive tables ($/fixture, $/motor, $/ton of cooling, etc.). The program also includes custom incentives and technical analysis services for measures not listed in the program incentive tables that improve electric energy efficiency. The current program offers incentives for lighting, motors, heating ventilation and air conditioning (“HVAC”), building envelope, food service equipment, appliances, irrigation, dairy/farm equipment, small compressed air, and other measures. Incentives are available for both retrofit projects and new construction/major renovation projects. The program is marketed primarily via trade allies, PacifiCorp staff, and a combination of other Company outreach efforts including print and radio advertising. This program began as Small Retrofit Incentive and Retrofit Incentive (Schedules 115 and 116) in November 2000 and was improved and renamed FinAnswer Express (Schedule 115) in May 2004. It was last modified November 20, 2010.

Program expenditures, kWh savings and incentives paid are outlined in the table below:

**Table 10**



Details of program savings by measure type are provided in the table below:

**Table 11**



**Major Trends and Activities**

Program changes were implemented upon completion of the program change process for FinAnswer Express as originally documented and approved in Advice 06-08 (Docket UE-061710). The notification of the changes was posted on the Company’s website October 6 and the changes became effective on November 20. The Company’s Business Plan update filed November 1 includes the program details for FinAnswer Express with the changes incorporated. The primary changes include:

|  |  |  |
| --- | --- | --- |
| **Measure Category** | **Change** | **Reason for Change** |
| Retrofit Lighting | Added new measure: Advanced/ Integrated Daylighting Control. | Because this new measure is added for new construction/major renovation lighting, it was also included in the changes for retrofits to have the option available for existing facilities as well. |
| New Construction/ Major Renovation Lighting | Reduced the incentive for T5 high output fixtures with 8 or more lamps. | A survey of market average costs in December 2009 indicated that fixture costs have decreased and incentive levels should be reduced commensurate with the change in incremental cost. |
| Sunsetted existing lighting control measures coincident with the effective date of the 2009 (WSEC). | The 2009 Washington State Energy Code (WSEC), effective 1/1/2011, made the previous lighting control measures required in most new construction. |
| Added new measure: Advanced/ Integrated Daylighting Control. | The planned new advanced daylighting controls measure exceeds the 2009 WSEC[[5]](#footnote-5). |
| Premium Efficiency Motors | Added a December 19, 2010 sunset date for premium efficiency motor incentives. Added a note that motors either installed or placed in inventory may qualify for an incentive. | As of December 19, 2010, AC induction motors up to 200 horsepower are subject to new minimum full-load nominal efficiency requirements as authorized in the Energy Independence and Security Act of 2007 (“EISA”). NEMA Premium™ high-efficiency motors will be explicitly required by federal code for motors sized 1 – 200 hp.  National Electrical Manufacturers Association (NEMA) Premium applies to motors from 1-500 horsepower. In preparation for the EISA 2007 change, vendor feedback indicates availability of NEMA Premium Efficiency Motors has increased for the full NEMA premium size range from 1-500 horsepower. The effect of the sunset date is to discontinue prescriptive incentives for 1-500 hp NEMA premium efficiency motors. |

|  |  |  |
| --- | --- | --- |
| **Measure Category** | **Description of Change** | **Reason for Change** |
| Other motor measures | Sunset the existing Electronically Commutated Motors measure for new construction/major renovation coincident with the effective date of the 2009 WSEC. | The 2009 WSEC makes electronically commutated motors required for new construction. |
| Increased the maximum size for a Green Motor Rewind from 500 to 5,000 horsepower.  Added a note that Green Motor Rewind motors either installed or placed in inventory may be eligible for an incentive.  Updated deemed values for Green Motor Rewinds to align with current Regional Technical Forum values for rewinds up to 500 horsepower. | These changes align FinAnswer Express with the Northwest’s regional Green Motor Rewind program. |
| HVAC | Added the new Integrated Energy Efficiency Ratio (“IEER”) metric to the air conditioning equipment minimum efficiency requirements.  These values are an alternative to the Integrated Part-Load Value (“IPLV”) values used to determine equipment eligibility for some air conditioners and heat pumps. | IEER is a new part load cooling metric that replaces the previous IPLV metric. The planned change aligns with the new practice for some manufacturers of providing the IEER rating instead of IPLV rating for new equipment lines. For older models, the IPLV rating is available, but not an IEER rating.  The addition of this IEER rating will permit the program to provide incentives for high efficiency equipment rated using either metric. |
| Food Service | Modified the minimum efficiency requirement for solid door refrigerators and freezers to state “ENERGY STAR®” so the requirements automatically match Energy Star standards as they evolve.  Also added the word “Vertical” to the measure name. | The previous efficiency requirements for solid door refrigerators and freezers were based on Consortium for Energy Efficiency (CEE) specifications. [CEE specifications](http://www.cee1.org/com/com-kit/files/RefrigerationSpecification.pdf) changed effective 1/1/2010. The change aligns the program with current CEE specifications, which refer to Energy Star. Note Energy Star has four size categories whereas the CEE specification had three size categories. |
| Appliances | Aligned minimum efficiency requirements and incentive levels for residential appliances (used in a business) to the Home Energy Savings program. | This allows the program to remain consistent with the Home Energy Savings program as it evolves. |

During 2010, the Company continued to support the Pacific Power Energy Efficiency Alliance, a trade ally network which provides support to lighting, motor, HVAC and other distributors and contractors who participate in offering the Company’s energy efficiency programs. Distributors, contractors and others are recruited, approved and trained on the Company’s programs. Upon approval, trade allies can promote the programs and are listed on the Company’s program website as a participating vendor.

Each year, training events are held for trade allies working with the FinAnswer Express program. The events were held February 17 and 18 in Yakima and Walla Walla. The events were attended by over 65 trade allies and provided information about program changes, recognized outstanding trade allies, and provided sales training on energy efficiency. On March 3, lighting trade allies attended a regional technical training in the Tri-cities area sponsored by Bonneville Power Administration’s Northwest Trade Ally Network and PacifiCorp to further improve lighting energy efficiency knowledge.

A dedicated team of technical and outreach specialists support trade allies throughout the year by conducting on-site program trainings, responding to inquiries from customers and trade allies, and publishing an educational newsletter.

In 2010, the Company added content to the web page specifically for trade allies at http://[www.pacificpower.net/alliance](http://www.pacificpower.net/alliance). This page includes service area maps, a link to program information, announcements for upcoming events, resources (Light Emitting Diode policy), and current and past newsletters.

**Program Evaluations**

Process and impact evaluations were completed in 2010 for the FinAnswer Express program in Washington for program years 2005 – 2008. The results of these evaluations are available on PacifiCorp’s website at:

<http://www.pacificorp.com/es/dsm/washington.html>

**Energy FinAnswer (Schedule 125)**

The Energy FinAnswer program serves commercial, industrial, and agricultural customers for retrofits and new construction. The program includes a vendor neutral investment grade energy analysis and cash incentives equal to $0.15 per kWh annual energy savings plus $50 per kW average monthly demand savings (up to 60 percent of project costs). There is a cap to prevent incentives from bringing the payback for a project below one year and a cap for lighting energy savings per project because lighting-only projects are included in FinAnswer Express. The program includes a commissioning requirement and post-installation verification. There are design assistance services and special incentives available for new construction and major renovation projects where energy code applies. The program is marketed primarily via PacifiCorp account managers, trade allies, Energy FinAnswer consultants and project staff. Other leads are received via word-of-mouth or past participants returning for additional projects and a combination of other Company outreach efforts.

Program results for 2010 are provided in Table 12 below.

**Table 12**



Details of program savings by measure type are provided in Table 13 below.

**Table 13**



**Program Evaluations**

Process and impact evaluations were completed in 2010 for the Energy FinAnswer program for program years 2005 – 2008. The results of these evaluations are available on PacifiCorp’s website at: <http://www.pacificorp.com/es/dsm/washington.html>

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# Overall Portfolio Expenditures and Results[[6]](#footnote-6)

# System Benefits Charge Balancing Account Summary

Demand-side Management activities are funded through Schedule 191, System Benefits Charge. Expenditures are charged as incurred and collected from the Systems Benefit Charge. The balancing account is the mechanism used for managing the revenue collected and expenses incurred in the provision of Demand-side Management programs. The balancing account activity for 2010 is included in this report consistent with Ordering Paragraph 8(c), Order 02, Docket UE-100170 and is outlined in Table 14 below.

**Table 14**



Column Explanations:

Deferred Expenditures: Monthly expenditures for all program activities, including funding for the Northwest Energy Efficiency Alliance.

Revenue Collected: Revenue collected through Schedule 191, System Benefits Charge.

Carrying Charge: Monthly charge based on “Accumulative Balance” of the account, accrued when cumulative revenue exceeds cumulative expenditures. On July 29, 2010 in Docket UE-001457, the Commission ordered that the carrying charge on negative balances (balances owing to customers) be eliminated going forward.

Accumulative Balance: Current balance of the account. A running total of account activities. If more is collected in “Revenue” than is spent for a given month, the “Accumulated Balance” will be increased by the net amount. A negative accumulative balance means cumulative revenue exceeds cumulative expenditures; positive accumulative balance means cumulative expenditures exceed cumulative revenue.

During calendar year 2010, the under-collected balance in the System Benefits Charge account decreased by $1.02 million. Therefore, PacifiCorp collected approximately $1.02 million more in revenue than was spent for program delivery during the year.

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# Cost Effectiveness

**Introduction**

The cost effectiveness of individual programs operated by the Company for 2010 is calculated using actual expenditures and reported savings. Cost effectiveness is provided at the individual program, residential energy efficiency portfolio, residential energy efficiency portfolio with non-energy benefits, non-residential energy efficiency portfolio, non-residential energy efficiency portfolio with non-energy benefits, overall demand-side management program portfolio levels, and overall demand-side management program portfolio with non-energy benefits. Deemed savings estimates, where applicable, were the same as those used in the planning estimates and filed forecasts, unless more recent estimates were available from evaluations.

Energy savings shown in this report are gross savings and the impact of line losses is indicated with an “at site” or “at generation” designation. Line losses are based on the Company’s 2007 line loss study. All cost effectiveness calculations will assume a Net-to-gross ratio of 1.0 consistent with the Council’s methodology. The energy savings attributed to each program are shaped according to specific end-use savings (the hourly calculation of when energy is used for the various end-use measures from which the savings are derived). Program costs and the value of the energy savings are then compared on a present value basis with the Company’s 2008 Integrated Resource Plan (“IRP”) calculated decrement values for demand-side resource savings and avoided capacity investments. The energy efficiency resource decrement values are fully shaped to represent the 8,760 hourly values that exist within a calendar year. By matching the hourly savings with the hourly avoided costs, both energy and capacity impacts of energy efficiency savings are recognized.

The five California Standard Practice Manual cost effectiveness tests as modified in the Northwest were utilized in the cost benefit analysis.

**Key Assumptions for Cost Effectiveness Calculations**

Cost effectiveness calculations for programs and measures (or measure groups) within each program will be detailed in the following tables.

Global assumptions used in all cost effectiveness calculations include:



Key elements that go into the cost effectiveness calculation for each program include:

* KW/kWh Savings at Gross
* Administrative expenses
* Incentives paid
* Total utility costs – including administration and evaluation
* Gross customer costs
* Net To Gross ratio
* Measure life
* IRP decrement value

The overall demand-side management portfolio and component sectors were all cost effective on all cost tests.

**Table 15**



Results of the cost effectiveness analysis, as conducted by The Cadmus Group are included Appendix 1. Please refer to the Cost Effectiveness Appendix 1 to this report for more information on the cost effectiveness tests and the assumptions and inputs.

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# Appendices

Appendix 1 – Cost Effectiveness Details

1. To remain consistent with the Northwest Power and Conservation Council’s regional power plan, the savings values in this table are shown prior to any net-to-gross adjustment. The values at generation include line losses between the customer site and the generation source. The Company’s assumed line losses by sector are 8.87 percent for residential, 8.73 percent for commercial and 7.54 percent for industrial. These values are based on the Company’s 2007 Transmission and Distribution Loss Study by Management Applications Consulting published in October 2008. [↑](#footnote-ref-1)
2. CFL Adjustment: The Energy Education Program savings reflect 941,195 kWh of savings related to installation of additional CFLs that are purchased by participants. This amount is adjusted out of the Residential portfolio results to avoid potentially double counting the savings in both the Energy Education program and Home Energy Savings program. [↑](#footnote-ref-2)
3. CFL Savings Reconciliation: An error was found in the company’s baseline for CFL savings.  It was found in December and it was corrected in December. [↑](#footnote-ref-3)
4. “Assessment of Washington Energy Education In Schools- 2009-2010 Program Year”, September 21, 2010 by The Cadmus Group. [↑](#footnote-ref-4)
5. Eligibility for Advanced/Integrated Daylighting Control is limited to daylight zones in spaces where integrated occupancy and/or daylighting controls are not required by the Washington State Energy Code. [↑](#footnote-ref-5)
6. In the Northwest regional power plan, savings potential for refrigerated warehouses is included in the industrial sector. This is consistent with the Company’s reporting for savings from this segment. Electric sales are identified as commercial. [↑](#footnote-ref-6)