

July 25, 2011

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Attention: David W. Danner  
Executive Director and Secretary

**RE: Docket No. UE-100170**

Dear Mr. Danner:

PacifiCorp, d.b.a. Pacific Power & Light Company, (“PacifiCorp” or “Company”) submits its response to comments filed by Public Counsel in the above referenced Docket on June 24, 2011, concerning PacifiCorp’s System Benefits Charge (“SBC”) adjustment compliance filing, which was submitted on April 29, 2011.<sup>1</sup> Public Counsel’s comments address certain aspects of PacifiCorp’s conservation programs and results in 2010 and the Company’s SBC compliance filing, but do not make specific recommendations to the Commission concerning these matters. Public Counsel does, however, offer suggestions regarding the Energy Education in Schools conservation program (“EES program” or “program”), savings estimates for conservation program measures and the content and scope of subsequent SBC adjustment filings.

Public Counsel’s comments address certain concerns with the EES program, which is administered through Schedule 113. The EES program was introduced in Washington as a tariffed conservation program in 2003.<sup>2</sup> The program facilitates an energy education curriculum which is made available to 6<sup>th</sup> grade students in elementary schools located in the Company’s Washington service area through three local non-profit community service agencies.<sup>3</sup> The curriculum consists of a minimum of three one-hour in-classroom energy education sessions which cover topics such as electricity generation, energy conservation, energy efficiency tips and meter reading. In addition to the classroom curriculum, participating students receive an energy savings kit to complement classroom learnings which consists of one compact fluorescent light bulb (“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.<sup>4</sup> During the 2009-2010 school year, 4,127 6<sup>th</sup> grade students participated in the program.

PacifiCorp has reported on the activities and results of the EES program since its inception through the annual conservation program reports filed with the Commission; annual reports for

---

<sup>1</sup> The SBC adjustment filing is required by item 8(d) of Order 02 (dated July 29, 2010) in Docket UE-100170.

<sup>2</sup> Refer to Docket UE-021689.

<sup>3</sup> Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish and Opportunities Industrialization Center of Washington in Yakima.

<sup>4</sup> Where a water flow test indicates a need, a low flow shower head is also provided to students.

calendar years 2003 through 2009 were filed under Docket UE-001457 and the 2010 annual report was filed in Docket UE-100170. In addition, the program has been evaluated annually by an independent third party evaluation firm since 2003. Public Counsel's concerns regarding the program raised in this proceeding are the first that have been expressed by stakeholders since the program was first approved by the Commission.

PacifiCorp is appreciative of the valuable input the DSM Advisory Group provides and is always open to discuss concerns that members of the Advisory Group have with the Company's conservation programs. The Company is planning to convene a DSM Advisory Group meeting in the near future to address the issues raised and to discuss potential modifications to the program going forward. PacifiCorp concurs with the position of Public Counsel that determination of program savings towards the Company's 2010-2011 biennial conservation target should not be examined at this time, but rather be deferred until after the Company has filed its two-year report on conservation acquisition for the 2010-2011 biennial period.<sup>5</sup>

Public Counsel also recommends the Company meet with the Advisory Group to discuss savings estimates for conservation program measures, including the CFL measure offered through the Residential Refrigerator Recycling Program (Schedule 107). PacifiCorp intends to discuss revised measure level savings estimates with the Advisory Group during the public involvement process of developing the Company's 2012-2013 biennial conservation target.

PacifiCorp appreciates the Commission's consideration of these matters and looks forward to continuing to work with the DSM Advisory Group and other interested stakeholders in advancing the acquisition of conservation resources in Washington. If you have any questions regarding these comments, please contact me at (503) 813-6043.

Sincerely,



Andrea Kelly  
Vice President, Regulation

CC: Mike Parvinen (E-mail)  
Dave Nightingale (E-mail)  
Deborah Reynolds (E-mail)  
Lea Daeschel (E-mail)

---

<sup>5</sup> This report is required by item 8(h) of Order 02 (dated July 29, 2010) in Docket UE-100170.