

Snyder, Jennifer (UTC)

From: Kouchi, Roger (UTC)
Sent: Tuesday, October 20, 2015 11:33 AM
To: UTC DL Records Center
Subject: FW: PSE Equipment Leasing - Public Comment (Dockets UE-151871 and UG-151872)

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Records Center – Please post this public comment in PSE’s leased equipment program filing (Dockets UE-151871 and UG-151872)

Roger

Review Status:	Not Reviewed	Submitted Date:	10/19/2015
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Utility Company Name:	Puget Sound Energy	Support the Filing Issue:	Undecided
Contact Method:	E-mail		

Comments:

The Northwest Energy Efficiency Council (NEEC) would like to provide comments on UE151871/151872. PSE involved NEEC over the past year or more as their plans for an equipment leasing program took shape. NEEC was given the opportunity to provide feedback and comment to the PSE plan as it developed and we appreciate the spirit of inclusiveness shown by the utility in this effort.

Our understanding is that PSE intends to serve a market component that may take advantage of equipment leasing options that could both increase the penetration of energy efficient equipment installed in their customer’s homes and provide both a quality assurance function for its installation and a more rigorous preventive maintenance program than what might be otherwise expected under baseline market conditions. NEEC does note that there are many instances in which customers must make hasty decisions to replace failed equipment and as such may not realize or exercise an option to install both high efficiency equipment and ensure a quality installation. Many trade allies may choose to partner with the utility in this effort to take advantage of either installation opportunities and for on-gong preventive maintenance arrangements for that equipment.

In fact, this point of partnership with trade allies is an important one. Utility programs, such as the one proposed here, should enhance existing market actors’ abilities to deliver high quality and energy efficient solutions to the market. A utility effort should work to facilitate and grow those market relationships, not supplant them. The leasing program effort should be judged in its ability to increase the penetration and long term performance of energy efficient equipment in the field and in its ability to do so in a fully collaborative partnership with the private sector. The program should be carefully designed and implemented to avoid undermining the business model of those private sector businesses who share the utility’s goal of increasing energy efficiency and customer

satisfaction.

Time will tell if there is a sufficient market response to this option to justify a leasing program and whether there are any negative effects to trade allies who might otherwise have expected to make an equipment sale to this market segment.

With full consideration of the ideas presented here, NEEC believes that Puget Sound Energy's approach can possibly contribute to growing the penetration of more energy efficient solutions in its' customer's buildings. It is important that this be achieved in a manner that works collaboratively with the trade ally community and not in competition with it.

Thank you for this opportunity to provide comment.

Stan Price, Executive Director
Northwest Energy Efficiency Council