



Rob McKenna  
**ATTORNEY GENERAL OF WASHINGTON**

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June 22, 2012

**SENT VIA E-MAIL & ABC LMI**

David Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
PO Box 47250  
Olympia, WA 98504-7250

**Re: Residential Energy Efficiency Program-Energy Education in Schools  
Docket UE-120701**

Dear Mr. Danner:

Public Counsel submits this letter in advance of the Commission's June 28, 2012, Open Meeting. These comments address PacifiCorp's proposed cancellation of the Energy Education in Schools Program, filed May 15, 2012, in Docket UE-120701.

**Public Counsel Recommendation**

Public Counsel supports the Company's proposal to cancel the Energy Education in Schools program and therefore recommends that the Commission take no action and allow PacifiCorp's proposed cancellation of Schedule 113 tariff in Docket UE-120701 to become effective.

PacifiCorp's Energy Education in School's program distributes energy education curriculum and energy savings kits to sixth grade students in the Company's Washington service territory. The energy savings kits include a CFL and other low-cost energy efficiency measures. As discussed in PacifiCorp's filing, concerns arose as to whether savings associated with the program could be adequately measured and verified.<sup>1</sup> This issue was discussed over a number of months with the Company, DSM advisory group, and PacifiCorp's program evaluator (Cadmus). As a result of these discussions, beginning in June of 2011 PacifiCorp ceased reporting savings under the program and began offering the program on an education-only basis.<sup>2</sup>

<sup>1</sup> Historically, savings estimates associated with measures in the kit were derived from student surveys and did not conform to RTF-deemed savings. In addition, no actual measurement of energy usage or verification of measure installation was done under the program. As PacifiCorp points out in this filing, Initiative 937 requires the Company to acquire all conservation that is "cost-effective, reliable, and feasible." However, the Company must also use savings estimates for programs that are based on "generally accepted impact evaluation data and/or other reliable and relevant source data that has verified savings levels." See Order 02, Docket UE-100170, Condition 6(c).

<sup>2</sup> PacifiCorp did claim savings for the 2010-2011 school year (September 2010-May 2011) associated with the Energy Education in School's program. The issue of whether savings for the Energy Education in School's Program



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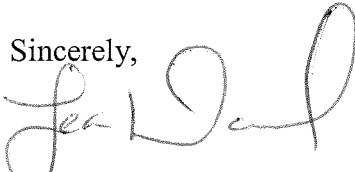
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While educational programs such as this certainly have merit in a general sense, Public Counsel seeks to ensure from a customer perspective that ratepayer funds are wisely spent on cost-effective programs and that claimed savings are real. Ultimately, it was determined that savings were not verifiable under this program.

Public Counsel was supportive of the decision to initially offer the program on an education-only basis. However, we are cognizant of the challenges the Company faces in terms of increased costs and technical challenges of modifying the measurement and verification method for the program. For these reasons, we support the Company's decision to cancel the program at this time. We understand that the Company is continuing to explore other education alternatives that may provide similar value but in a more cost-effective manner. We look forward to reviewing any future proposals from the Company related to energy education.

I plan to attend the June 28, 2012, Open Meeting for Public Counsel and will be available to address any questions regarding these comments.

Sincerely,



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