

December 1, 2017

Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 Evergreen Park Drive SW  
Olympia, WA 98504-7250

*Re: Docket No. UE-171092, Pacific Power & Light's Ten-Year Achievable Conservation Potential, Biennial Conservation Target, and Biennial Conservation Plan for 2018-2019, pursuant to RCW 19.285.040 and WAC 480-109-120*

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The NW Energy Coalition (NWECC or Coalition) appreciates the opportunity to comment on Pacific Power & Light's (PacifiCorp or the Company) 2018-2019 Biennial Conservation Target and Biennial Conservation Plan (BCP). The Coalition is a participant in PacifiCorp's Washington DSM Advisory Group and actively participates in PacifiCorp's Integrated Resource Plan (IRP) process.

NWECC offers general support for PacifiCorp's filing and will continue working through the Advisory Group to offer strategic advice on the Company's development and implementation of programs, particularly as the Company looks for ways to engage hard-to-reach markets. Below are a few additional comments for the Company to consider.

*Residential Financing Pilot:* NWECC is supportive of PacifiCorp's On-Bill Repayment pilot, offered with Craft3. We would like to express particular encouragement for the development of a manufactured home offering, as mentioned in the BCP, with attention to those who own their homes but rent the land underneath. We look forward to hearing results of the pilot at the Advisory Group, including any challenges or barriers to customer participation, and whether there are additional mechanisms that can encourage customers to take advantage of financing, such as an interest buy-down or a credit reserve to allow more customers to qualify.

*Non-Residential Pay-for-Performance:* Other Washington utilities are beginning to explore and pilot non-residential pay-for-performance programs to encourage deeper and more comprehensive retrofits and behavioral changes. NWECC encourages PacifiCorp to review these pilots and other examples and develop a pilot for its large non-residential customers.

*NEEA Savings:* In UTC staff comments emailed to the Company on October 23, 2017, Staff expressed that IOUs should include NEEA forecast savings within their biennial target. NWECC looks forward to further discussions with Staff and the Company about this issue, how the decoupling commitment should be calculated, and ensuring a common approach by all IOUs.

Respectfully submitted,  
Amy Wheelless  
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NW Energy Coalition