

March 5, 2010

David Danner, Executive Director and Secretary  
Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98514-7250

Re: Docket Numbers UE- 100170, UE- 100176, and UE-100177

Dear Mr. Danner:

WAC 480-109-010 requires that each Investor Owned Utility (IOU) in Washington file a report with the commission every two years identifying its ten-year achievable conservation potential and its biennial conservation target. The methods available to develop these targets include a calculator developed by the Northwest Power and Conservation Council that identifies cost-effective conservation targets consistent with the current Power Plan or the utility's current Integrated Resource Plan.

In the filings with UTC, only one utility developed its biennial conservation target using methods based on the Conservation Council's 6th Power Plan. The 6th Power Plan includes updated analysis that significantly increases the cost-effective conservation potential for the region. While the 6<sup>th</sup> Power Plan was only in draft form prior to the submission deadline for the IOUs, the Conservation Council had made the updated calculator based on that draft plan available.

RCW 70.235.020 establishes the state's policy to reduce greenhouse gas emissions to 1990 levels by 2020. Investing in all cost-effective electricity conservation measures as defined by the Conservation Council is an important action the state has already required and will help us reach our statutory emissions reductions. We would encourage each utility to update their ten-year achievable potential and biennial target using methods consistent with the 6th Power Plan instead of the outdated 5th Power Plan.

Thank you for the opportunity to comment.

Sincerely,

Janice Adair  
Special Assistant to the Director  
Climate Policy