

3TIER Environmental Forecast Group  
Advocates for the West  
Alaska Housing Finance Corporation  
Alliance to Save Energy  
Alternative Energy Resources Organization  
American Rivers  
The Apollo Alliance  
Audubon Washington  
Bonneville Environmental Foundation  
Central Area Motivation Program  
Citizens Utility Board of Oregon  
City of Ashland  
Clackamas County Weatherization  
Climate Solutions  
The Climate Trust  
Community Action Partnership of Oregon  
Community Action Partnership Assoc. of Idaho  
Conservation Services Group  
David Suzuki Foundation  
Earth and Spirit Council  
Earth Ministry  
Ecos Consulting  
eFormative Options, LLC  
Emerald People's Utility District  
The Energy Project  
Energy Trust of Oregon, Inc.  
enXco Development Corporation  
Environment Oregon  
Environment Washington  
Eugene Water & Electric Board  
Golden Eagle Audubon Society  
Grasslands Renewable Energy  
Home Performance Washington  
Housing and Comm. Services Agency of Lane Co.  
Human Resources Council, District XI  
Iberdrola Renewables  
Idaho Conservation League  
Idaho Rivers United  
Idaho Rural Council  
Idaho Wildlife Federation  
Interfaith Network for Earth Concerns  
Kootenai Environmental Alliance  
Laborers International Union of North America, NW Region  
League of Women Voters – ID, OR & WA  
Local Energy Alliance of Washington  
Metrocenter YMCA  
Missoula Urban Demonstration Project  
Montana Audubon  
Montana Environmental Information Center  
Montana Public Interest Research Group  
Montana Renewable Energy Association  
Montana River Action  
Montana Trout Unlimited  
Moontown Foundation  
The Mountaineers  
Multnomah County Weatherization  
National Center for Appropriate Technology  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest Energy Efficiency Alliance  
Northwest Energy Efficiency Council  
Northwest Renewable Energy Institute  
Northwest Solar Center  
NW Natural  
NW SEED  
Olympic Community Action Programs  
Opportunities Industrialization Center of WA  
Opportunity Council  
One PacificCoast Bank  
Oregon Action  
Oregon Energy Coordinators Association  
Oregon Environmental Council  
Oregon HEAT  
Oregonians for Renewable Energy Policy  
Pacific Energy Innovation Association  
Pacific NW Regional Council of Carpenters  
Pacific Rivers Council  
The Policy Institute  
Portland Energy Conservation Inc.  
Portland General Electric  
Puget Sound Alliance for Retired Americans  
Puget Sound Energy  
Renewable Northwest Project  
River Network  
Salmon for All  
Save Our Wild Salmon  
Seattle Audubon Society  
Seattle City Light  
Sierra Club  
Sierra Club, BC and MT Chapters  
Silicon Energy  
Snake River Alliance  
Solar Oregon  
Solar Washington  
South Central Community Action Partnership, Inc  
Southeast Idaho Community Action Agency  
Southern Alliance for Clean Energy  
Spokane Neighborhood Action Programs  
Smart Grid Oregon  
Student Advocates for Valuing the Environment  
SustainableWorks  
Sustainable Bainbridge  
Tahoma Audubon Society  
Trout Unlimited  
Union Of Concerned Scientists  
United Steelworkers of America, District 11  
WA CTED - Housing Division  
Washington CAN!  
Washington Environmental Council  
Washington State University Energy Program  
Working for Equality And Economic Liberation  
A World Institute for a Sustainable Humanity  
World Steward



NW Energy Coalition  
for a clean and affordable energy future

December 17, 2012

Utilities and Transportation Commission  
Attn: Records Center  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

**Docket No. 121119 – Avista Corp – Tariff Revision – Temporary Discontinuation of Natural Gas Demand-Side Management Programs**

The Coalition submits this final written comment prior to the Commission recessed open meeting on December 21.

The workshop on natural gas conservation cost effectiveness provided an opportunity for an exchange of ideas and opinions on the mechanics of cost effectiveness calculations. While there was broad agreement that the total resource cost test should remain the primary filter through which programs are evaluated, questions remain as to how the TRC should be applied. Numerous parties suggested ideas for modifications to the current status quo that may create a more thorough and equitable TRC analysis.

Those ideas include accurate quantification of the non-energy benefits of efficiency programs to the utility such as hedge benefits against price volatility, arrears reductions, connection/disconnection savings, and gas storage savings. Other suggestions included a review of the discount rate applied to these programs, the inclusion of non-energy benefits, and a portfolio application of the TRC rather than on individual program basis.

There were no definitive conclusions coming out of the workshop and as such it would be premature for the Commission to discontinue the Avista programs. As the Coalition said in its initial comments filed on September 21 in this docket, a discontinuation would create risks to customers, including energy savings lost opportunities, and would damage the trade ally network that works with customers. It is not clear that the Commission has fully analyzed these risks and the ramifications for the other natural gas providers in Washington were Avista's programs to be discontinued. Instead, a temporary waiver of the TRC would be appropriate while the Commission further studies these issues and continues to work with stakeholders.

In October, Governor Gregoire issued an Executive Order 12-06 directing state agencies to reduce all building energy use by 20 percent by 2020 (in both owned and rental facilities). The EO specifically mentions the use of

Seattle: 811 1<sup>st</sup> Ave. #305, Seattle, WA 98104 • (206) 621-0094 • (206) 621-0097 fax  
Salem: (503) 851-4054 • (503) 390-6287 fax  
www.nwenergy.org • nwcc@nwenergy.org

utility rebates and incentives as a part of the funding stream that agencies should seek to utilize for their efficiency investments. Discontinuation of the Avista gas programs will make it harder for state agency buildings and offices in the Avista service territory to achieve this important goal.

The Coalition urges the Commission to either reject the Avista filing, delay a decision in this docket or grant a waiver from the TRC for individual natural gas programs while the entire portfolio is evaluated for modifications that address cost effectiveness.

Thank you for your consideration,

Nancy Hirsh and Lynne Dial